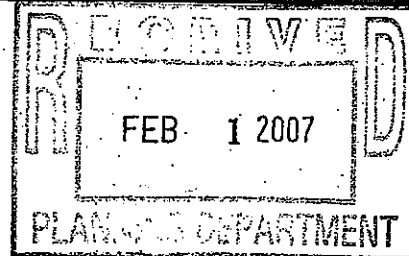


County of Loudoun  
Department of Planning  
MEMORANDUM

DATE: February 1, 2007  
TO: Rodion Iwanczuk, Project Manager  
Land Use Review  
FROM: Melanie L. Wellman, Planner *mlw*  
Community Planning



SUBJECT: SPEX 2006-0022 Western High School at Fields Farm 2<sup>nd</sup> referral

BACKGROUND

Loudoun County Public Schools, the applicant, on behalf of Loudoun County Board of Supervisors, the property owner, is requesting a Special Exception to allow a high school on a portion of the Fields Farm Property. The Fields Farm Property is approximately 230 acres and is located on Route 711 (Alder School Road), north of Purcellville and the Route 7 Bypass, between Route 690 (Hillsboro Road) and Route 611 (Purcellville Road). The site is zoned JLMA-3 (Joint Land Management Area - 3), and the area of the parcel where the high school is proposed is planned for residential uses. The high school is proposed for 145.75 acres of the 230-acre property. Mountain View Elementary School is currently located on the northwest portion of the Fields Farm Property. Recreational uses for the Upper Loudoun Youth Football League have been approved for the southern portion of the property, south of the future collector road. Uses surrounding the property include large residential lots and subdivisions as well as industrial uses to the south.

The Loudoun County Board of Supervisors purchased the Fields Farm Property in 2000. Mountain View Elementary School was constructed on the northwest portion of the property and opened in the Fall of 2003. During that time there were discussions about locating a high school on the property as well. In June 2006, the Board of Supervisors passed a motion to provide its consent and authorization to participate in a Special Exception application for a Western High School at Fields Farm and directed staff to concurrently review the site and construction plans for the high school and related improvements while the Special Exception request was under review.

The high school is proposed to be approximately 260,000 square feet and have a capacity for 1,600 students. Facilities associated with the high school are also

proposed on the Fields Farm Site, including a high school football stadium, concession stands, ticket booths, storage buildings, a field house, baseball field, and other athletic fields. Pervious and grass parking surfaces have been proposed. The applicant states a desired opening of Fall, 2008.

As stated in the first referral, Loudoun County Public Schools recognizes the need for an additional high school in western Loudoun, and in particular in the Purcellville JLMA, as this is a central location along Route 7, a primary transportation corridor. Per the Purcellville Urban Growth Management Plan (PUGAMP) policy of providing a full complement of public facilities and services to the Purcellville area, the subject site would be an appropriate location for a high school. The need for a future high school was determined when PUGAMP was approved in 1995, as shown on the Existing and Proposed School Locations Map. Since a high school is not able to be constructed in the specific location depicted on the map due to existing subdivision activity, the general vicinity location of the Fields Farm makes it an appropriate location in terms of land use. Furthermore, the Fields Farm Property was purchased by the County for public facilities purposes, schools, and parks/recreation facilities. The location of the proposed high school is consistent with PUGAMP policies that encourage the concentration of public and facility service development around the Town (and in particular north of the town).

In the first referral Community Planning also stated several concerns with the application in terms of site design, environmental impacts, pedestrian mobility, and transportation issues. The applicant has responded to staff's first referral comments by providing a revised Statement of Justification, a response to first referral comments, a revised SPEX plat, proposed high school elevations, Phase I Archeological Investigations dated June 2006, a Reconnaissance Level Architectural Survey dated August 2006, a Letter from Virginia Department of Historic Resource, and a Phase II Archeological Investigation. A number of Community Planning's issues have been resolved, including using low impact development (LID) techniques on site, providing sidewalks on both sides of all roads (with the exception of along the floodplain), providing a 10' asphalt trail along Route 711 (Alder School Road), committing to specific lighting measures, complying with County requirements for noise associated with the public address system, and depicting drainfields on the SPEX plat.

Outstanding issues, including transportation impacts, are outlined in further detail below.

## **OUTSTANDING ISSUES**

### **1. Transportation Impacts**

In the first referral, staff recommended the applicant state any future intentions for the North Collector Road, including whether there will be contributions to its construction and whether the Western High School plans to access the road. PUGAMP specifically states that uses such as schools, which serve a regional population, should have

access to a collector road or arterial. The applicant has responded by stating that the only potential access to the North Collector Road would be for a secondary emergency access to the high school; and that the applicant does not propose to contribute to construction of the road. Staff notes that the only access to a public roadway would be to Route 711, Alder School Road, which is not a collector road or arterial at this location. While this route is paved at the point of access to the high school property, it is unpaved between Route 611 and Route 287 to the east. Staff is concerned about the regional road impacts resulting from the increase in traffic volumes associated with the proposed high school, as well as the safety of automobile traffic on nearby unpaved roads.

***Staff recommends the applicant ensure that all transportation impacts for the proposed high school will be mitigated. If the proposed high school will not have access to a collector road or arterial, staff recommends the applicant ensure that the existing roadways will be able to accommodate the amount of traffic generated. In addition, staff recommends the applicant work closely with Office of Transportation Services (OTS) to discuss transportation impacts, and possible road improvements and contributions.***

## **2. Trail Between Football Stadium and High School**

In the first referral staff recommended a bicycle and pedestrian trail connection between the football stadium and the large high school parking lot, with a span-style boardwalk or bridge incorporated into the design of the trail over the floodplain. The applicant has responded by stating that "parking for the football stadium is provided in proximity to the stadium" and "should the large high school parking lot be utilized during football games or other stadium events, there is a sidewalk along the internal roadway that will provide pedestrian access to the stadium." Staff commends the applicant for providing sidewalks along all internal roadways. However, if the larger high school parking lot was to be used by event-goers, or should students be walking from the high school to practice at the stadium, a trail connection would offer a shorter and more direct route. In addition, a trail could be safer to walk along than the internal roadway and sidewalks at times when traffic volumes would be higher; e.g. at the end of the day when school buses and automobiles are traveling along this roadway. Staff continues to recommend a span-style bridge or boardwalk design, as a trail connection would traverse the floodplain in the center of the site.

***Staff recommends a trail connection between the football stadium and large high school parking lot, as this would be a more direct route from the stadium to the high school and associated larger parking lot. Staff recommends a span-style bridge or boardwalk be incorporated into the design of the trail over the floodplain.***

### 3. Water Quality & Conservation Measures

As stated in the first referral, groundwater supplied through wells and springs owned by the Town of Purcellville is an important source of drinking water in the Purcellville area. Staff recommended that additional information be provided regarding the well and wellhead protection, depth of wells, location of neighboring wells, and whether they are up gradient from septic fields. Staff further recommended water conservation measures be implemented to protect water quality, pursuant to Plan policy of ensuring protection from contamination and maintaining an adequate level of drinking water for all residents.

The applicant has responded by providing specific information on the depth of wells, wellhead protection, location of neighboring wells, and stated that there are no existing or proposed septic fields up-gradient from any wells, as requested by staff. However, staff continues to be concerned with the possibility of contamination and maintaining an adequate level of drinking water for residents, as the Division of Environmental Health has not yet recommended approval of the application. Groundwater supplied through wells and springs is an important source of drinking water in the Purcellville area; therefore it is imperative that the application ensure groundwater will be protected from contamination.

The applicant has also responded that certain aspects of the site design will help maintain water quality and quantity on site, including on-site re-infiltration of treated wastewater and sports field irrigation water; conservation of on-site floodplain and wetlands; and the use of low-flow toilets to reduce water use. Staff commends the applicant for proposing to use conservation measures such as these. The applicant should commit to these measures. Staff notes that a high-intensity use, such as high school, would be best served by central utilities such as water and sewer, rather than wells and drainfields proposed with this application.

***Staff recommends the applicant work with the Division of Environmental Health to ensure that the proposed wells will provide the proper level of drinking water needed, and that residents will be protected from contamination. In addition, staff recommends a condition of approval that specific water conservation measures will be put into place, including on-site infiltration of treated wastewater and sports field irrigation water, and low-flow toilets.***

### 4. Drainfields

In the first referral staff requested additional information regarding the drainfields on site and whether the existing drainfield for the elementary school will be shared with the high school. Staff was also concerned with the location of one particular drainfield, as it was depicted on the SPEX plat to be located within the conceptual alignment for the North Collector Road. The applicant has responded by stating that the drainfields for the elementary school and the high school are separate systems. Also, the drainfield area that had previously been shown at the conceptual alignment for the North

Collector Road has been eliminated. However, staff notes that the Loudoun County Health Department is currently recommending denial, as the septic design is currently under review, and the detailed hydrogeological study has not been completed. The issue of whether the drainfields on site are sufficient and will not contaminate nearby wells continues to be of concern. There needs to be assurance that the high school drainfields will not be shared with the elementary school or other facilities, as communal systems are not in conformance with the Comprehensive Plan. Staff notes that a high-intensity use, such as high school, would be best served by central utilities such as water and sewer, rather than wells and drainfields proposed with this application.

***Staff recommends the applicant work with the Division of Environmental Health regarding drainfields on site, in particular whether they are sufficient to serve the proposed high school, and that measures are being taken to preclude contamination to nearby wells. Staff recommends a condition of approval that the high school drainfields will not be shared with the elementary school or other facilities.***

## **5. Restoration of the Stream Corridor**

In the first referral, staff recommended that the previous restoration effort along the stream corridor, which is a headwater tributary to the South Fork of the Catoclin Creek, be reinspected to determine the current state of the tree shelters in that area. In addition, staff recommended that reforestation continue throughout the entire riparian corridor, from the northern property line to the southern property line. Furthermore, staff recommended a reforestation plan be submitted for staff's review. The applicant has responded by stating that they will work with wetland consultants and the County Arborist to review the minor floodplain area to determine how best to enhance this area. A reforestation plan has not been submitted for staff's review. The applicant should commit to work with the County to review the state of the stream corridor, and commit to reforestation of the river and stream corridors on the Fields Farm property.

***Staff recommends a condition of approval that the applicant work with the County to review the condition of the river and stream corridor, and commit to reforestation of the river and stream corridors on the Fields Farm property.***

## **6. River and Stream Corridor Resources Near Proposed Stadium**

In the first referral staff recommended protection of the river and stream corridor resources between Route 711 and the proposed football stadium and assurance that they are not impacted by parking or vehicular traffic. The applicant has responded by stating they will ensure the river and stream corridor resources in that area are not impacted. However, the applicant has failed to show exactly how this sensitive environmental area will be protected. The SPEX plat indicates that the stadium, associated parking, and the SWM/BMP facility have been located out of the river and stream corridor resources area. Staff commends the applicant for designing around this area. However, it is possible that overflow from the parking lot could occur if the lot is

full, and that these resources could be impacted. Since the application has been designed to preserve the river and stream corridor resources between Route 711 and the football stadium, additional efforts should be made to ensure that overflow parking does not impact the area.

***Staff recommends placing a fence, berms, landscaping, or other type of buffering around the parking area and internal roadway adjacent to the river and stream corridor resources between Route 711 and the proposed football stadium in order to prevent possible encroachment into the environmental area being preserved.***

## **7. Commission Permit**

In a determination letter dated June 22, 2006, the Loudoun County Zoning Administrator issued a determination that a Commission Permit for the proposed use would not be required, as a public high school is a feature depicted on Figure 10, which shows general locations for schools in the JLMA (Attachment 1). The Town's appeal of this determination to the Loudoun County Board of Zoning Appeals (BZA) was denied on September 28, 2006.

***Staff recommends that the Planning Commission make a finding through this Special Exception regarding conformity of the Field's Farm site with the Comprehensive Plan.***

## **RECOMMENDATION**

The proposed high school is sited in an appropriate location in terms of land use, is consistent with the PUGAMP policies of providing a full complement of public facilities and services to a growing population in the Purcellville area, and is depicted on the generalized Existing and Proposed School Locations map in the PUGAMP. However, staff is unable to recommend approval of the proposal until the outstanding issues, as identified above, are resolved. The application should be amended, or conditions developed, to address the following:

1. Mitigate all transportation impacts for the proposed high school;
2. Ensure that existing roadways will be able to accommodate the amount of traffic generated;
3. Work closely with Office of Transportation Services (OTS) to discuss transportation impacts, and possible road improvements and contributions;
4. Provide a trail connection between the football stadium and large high school parking lot, as this would be a more direct route from the stadium to the high school and associated larger parking lot. A span-style bridge or boardwalk should be incorporated into the design of the trail over the floodplain;

5. Work closely with the Division of Environmental Health to ensure that the proposed wells will provide the proper level of drinking water needed, and that residents will be protected from contamination;
6. Work closely with the Division of Environmental Health regarding drainfields on site, in particular whether they are sufficient to serve the proposed high school, and that measures are being taken to preclude contamination to nearby wells;
7. Work with the County to review the condition of the river and stream corridor on site, and commit to reforestation of the river and stream corridors on the Fields Farm property; and,
8. Place a fence, berms, landscaping, or other type of buffering around the parking area and internal roadway adjacent to the river and stream corridor resources between Route 711 and the proposed football stadium in order to prevent possible encroachment into the environmental area being preserved.

In addition, staff recommends the following be incorporated into conditions of approval:

1. That low impact development (LID) techniques, including Enhanced Extended Detention Basin, Extended Detention Basin, and Bioretention Basins will be utilized on site;
2. That trails and sidewalks will be provided in conformance with what is shown on the SPEX plat;
3. That site, building, and parking lot lighting be designed and constructed with full cut-off and fully shielded fixtures so that the light will be directed inward and downward toward the interior of the property, away from adjacent streets and properties, is confined to the site, and has illumination levels that are no greater than necessary for a light's intended purpose;
4. That parking lot lighting be turned off within one hour following the end of evening activities, or 12 a.m., whichever occurs first;
5. That athletic field lighting be directed inward and downward toward the fields and that athletic lighting incorporate a reflector technology system that directs light onto the fields and minimizes glare, spillage, skyglow, and deterioration of the nighttime environment;
6. That the applicant comply with County requirements for noise associated with the public address system;
7. That specific water conservation measures will be put into place, including on-site infiltration of treated wastewater and sports field irrigation water, and low-flow toilets;

8. That the high school drainfields will not be shared with the elementary school or other facilities; and
9. That the applicant work with the County to review the condition of the river and stream corridor on site, and reforest the river and stream corridors on the Fields Farm property.

Staff would be happy to meet with the applicant to discuss these issues.

**ATTACHMENT**

Attachment 1: Commission Permit Determination letter

cc: Julie Pastor, AICP, Director, Planning  
Cynthia L. Keegan, AICP, Program Manager, Community Planning  
Susan Berry Hill, Program Manager, Community Information & Outreach



Pastor



## Loudoun County, Virginia

Department of Building and Development  
1 Harrison Street, S. E., Leesburg, VA 20177-7000  
Administration: 703/777-0397 Fax: 703/771-5215

June 22, 2006

Ms. Sara Howard-O'Brien, AICP  
Land Management Supervisor  
Loudoun County Public Schools  
21000 Education Court  
Ashburn VA 20148

Re: Commission Permit Determination for western Loudoun High School  
PIN 522-29-5928

Dear Ms. Howard-O'Brien:

This letter is written to address certain zoning matters related to the proposed western Loudoun high school site on a portion of the above referenced site (i.e. Fields Farm) located in the unincorporated area of Loudoun County.

Development of the property is governed by the Loudoun County Zoning Ordinance. This is the only zoning ordinance that applies to the portion of the referenced property in the unincorporated portion of the County. Pursuant to § 6-401 of the Revised 1993 Loudoun County Zoning Ordinance (LCZO), only the Loudoun County Zoning Administrator (or designee) is authorized to make binding determinations regarding the applicable zoning regulations. No official from the Town of Purcellville is authorized to make any order, requirement, decision, or determination in the enforcement of any ordinance adopted pursuant to Article 7, Title 15.2 of the Code of Virginia (the zoning enabling legislation) concerning property in the unincorporated portion of the County. Specifically, no Town official has authority to make determinations regarding Commission Permit requirements incorporated as part of the LCZO.

Section 6-1101(A) of the LCZO requires that no public building or structure shall be constructed, established or authorized unless the Planning Commission approves the general or approximate location, character and extent thereof. This is referred to as a Commission Permit and the requirements incorporate the provisions of Va. Code §15.2-2232. Section 6-1101 (D) provides that the Commission Permit requirement does not apply if the public area, facility or use is deemed to be a feature already shown on the Comprehensive Plan. In consultation with the Loudoun County Planning Director, it is my determination that a public high school located on the referenced property is a feature shown on the Comprehensive Plan. The relevant portion of the Comprehensive Plan applicable to this area is the Purcellville Urban Growth Area Management Plan (PUGAMP) approved in 1995.

Sara Howard-O'Brien  
June 22, 2006  
Page two

PUGAMP contains Figure 10 which shows general locations for schools in the urban growth area, now called the joint land management area (JLMA), including a new public high school to be located north of State Route 7. The referenced property is located in that general vicinity. Further, consistent with the figures and the policies contained within the PUGAMP, the County purchased the Fields Farm to address the public facility needs of the area. This site was so designated in the 2001 Revised General Plan (p3-7).

Even in situations where a Commission Permit may be required for a school facility in the unincorporated area of Loudoun County within the Purcellville Urban Growth Area (or JLMA), there is no requirement under Section 6-1100 of the LCZO for concurrence by the Town of Purcellville in the approval of the Commission Permit.

The property is zoned JLMA-3 and FOD. Pursuant to LCZO Table 2-1203, a public high school is a special exception use in the JLMA-3 district. A floodplain alteration may also be required to fully use this site. It is my understanding that the County staff and the School Board staff have already conducted a preapplication meeting in anticipation of the filing of a special exception application for this use. As previously stated above, the school is a "feature shown" on the plan and a Commission Permit is not required for this use.

This determination applies solely to the referenced property and is not binding upon the County, the Zoning Administrator or any other official with respect to any other property. No person may rely upon this determination with respect to any property other than the referenced property.

By copy of this letter, this determination is also being communicated to the Town of Purcellville.

Please be advised that any person aggrieved, or any officer, department or agency of Loudoun County affected by an order, requirement, decision or determination made by an administrative officer in the administration or enforcement of the provisions of the *Zoning Ordinance* may appeal said decision within thirty days to the Board of Zoning Appeals in strict accordance with Section 15.2-2311 of the *Code of Virginia*. This decision is final and unappealable if not appealed within 30 days.

Very truly yours,



Melinda M. Artman  
Zoning Administrator

Sara Howard-O'Brien  
June 22, 2006  
Page three

Attachment: June 12, 2006 Memorandum from Julie Pastor

cc: Chairman and Members, Board of Supervisors  
Mayor and Members, Purcellville Town Council  
Robert Lohr, Purcellville Town Manager  
Maureen K. Gilmore, Purcellville Town Attorney  
Ed Hatrick, D. Ed., Superintendent, LCPS  
E. William Chapman, School Board Attorney  
Kirby Bowers, County Administrator  
John R. Roberts, County Attorney  
Terrance D. Wharton, Director  
Julie Pastor, Director, Department of Planning ✓

/mma

County of Loudoun  
Department of Planning  
MEMORANDUM

**DATE:** June 12, 2006  
**TO:** Melinda Artman, Zoning Administrator  
**FROM:** Julie Pastor, Director  
**SUBJECT:** Commission Permit Determination for a New Western Loudoun High School (HS-3) at Fields Farm (PIN 522-29-5928)

**RECEIVED**  
JUN 13 2006  
BUILDING AND DEVELOPMENT

The factors listed below are recommended to you as the basis for determining whether a commission permit for a new high school on the Fields Farm property should be required.

- The subject property is located in the Purcellville Joint Land Management Area (JLMA) and the applicable planning document is the Purcellville Urban Growth Area Management Plan (PUGAMP) which was jointly adopted by the Town and the County in 1995.
- Policy 2, page 47 of PUGAMP states that:  
*"The Town of Purcellville will generally be the preferred location for new public facilities unless a suitable site is not available in the Town, or the facility (such as an elementary school) is designated to serve a local or neighborhood population. The preferred location for new school sites is shown on Figure 10, page 48..."*
- Figure 10, page 48 (PUGAMP) depicts existing and proposed school locations. In addition to existing schools, PUGAMP anticipates four new school sites in the JLMA. These are generally located as follows:
  - one elementary site in the southeast quadrant;
  - one elementary site in the northwest quadrant (the Mountain View Elementary School has since been built in the vicinity of this symbol);
  - one middle school site north of the Route 7 Bypass, in the central area of the JLMA; and
  - one high school site north of the Route 7 Bypass in the northeast quadrant of the JLMA
- Figure 10 is an illustrative map that shows the general vicinity in which schools may be located.

- The map and Policy 2 should be considered together for purposes of determining whether a commission permit would be required. The symbols for proposed school sites, as represented on Figure 10, are generally "preferred" locations for school sites.
- Since 1995, subdivisions have been built north of Route 7 in the general area where symbols are shown for a new high school and a new middle school. The need and direction for school sites in the JLMA north of Route 7 as contained in the PUGAMP remain despite this subdivision activity. As such, the Fields Farm, being located north of Route 7 in the general vicinity of the symbols, would be in substantial accord with the Comprehensive Plan.
- In 2000, the County purchased the Fields Farm property for purposes of building public facilities needed to serve the area including an elementary school (now Mountain View Elementary), active recreation, and potentially a high school. The Revised General Plan (RGP), adopted in 2001, carried forward this intent by depicting the Fields Farm property as a public facility site on the Public Facilities Map in the RGP (p. 3-7).

While PUGAMP supersedes the Revised General Plan as the guiding document for the Purcellville JLMA, it should be noted that a Draft Update of the PUGAMP is currently before the Town Council and Board of Supervisors for approval. Like the RGP, the Draft PUGAMP depicts the Fields Farm site as a location for public facilities. The Draft PUGAMP policies also note that public facilities, including a high school, may be located at Fields Farm. While the Draft PUGAMP cannot be consulted for this determination, it should be noted that all of these planning documents (current PUGAMP, RGP and Draft PUGAMP) acknowledge Fields Farm as a public facility site.

cc: Jack Roberts, County Attorney  
Susan Berry Hill, Program Manager, Community Information and Outreach  
Cindy Keegan, Program Manager, Community Planning

**Transportation** - The applicant and OTS have met and discussed transportation impacts, road improvements, and contributions as staff recommended. It appears that although the school will not have access to a major collector road or arterial, that transportation impacts will be mitigated. Staff believes this issue will be resolved if the applicant agrees to OTS's comments 8 regarding allocation of the regional road contribution, as well as comment 9 regarding phasing being included as a condition of approval. Once the applicant has fully addressed OTS staff concerns I believe the application will fully mitigate any transportation impacts.

**Water quality and conservation measures** - the applicant has worked with Division of Environmental Health and Environmental Health is now able to recommend approval. Therefore, staff is no longer concerned that the application would impact wells. This issue is resolved, as long as the applicant agrees to a condition of approval that water conservation measures will be put into place, including no-flow or low-flow fixtures, even if it is on a trial basis as suggested by the applicant. (see condition of approvals below).

**Restoration of the stream corridor** - Issue addressed. The applicant has agreed to work with ERT and the County Arborist to provide a reforestation plan.

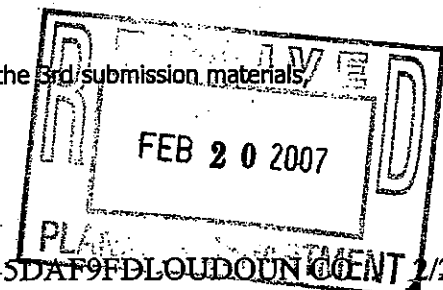
To conclude, all of staff's outstanding issues have been resolved. Staff is able to recommend approval of the application with the following conditions of approval:

1. That low impact development (LID) techniques, including Enhanced Extended Detention Basin, and Bioretention Basins will be utilized on site;
2. That trails and sidewalks will be provided in conformance with what is shown on the SPEX plat;
3. That site, building, and parking lot lighting be designed and constructed with full cut-off and fully shielded fixtures so that the light will be directed inward and downward toward the interior of the property, away from adjacent streets and properties, is confined to the site, and has illumination levels that are no greater than necessary for a light's intended purpose;
4. That parking lot lighting be turned off within one hour following the end of evening activities, or 12 a.m., whichever occurs first;
5. That athletic field lighting be directed inward and downward toward the fields and that athletic lighting incorporate a reflector technology system that directs light onto the fields and minimizes glare, spillage, skyglow, and deterioration of the nighttime environment;
6. That the applicant comply with County requirements for noise associated with the public address system;
7. That water conservation measures be put into place, including low-flow or no-flow fixtures, which could be implemented on a trial basis;
8. That high school drainfields will not be shared with the elementary school or other facilities; and,
9. That the applicant will work with the County to review the condition of the river and stream corridor on site, and submit a restoration plan for the corridor.

\* you or the applicant has any questions let me know. Thanks for the opportunity to review the 3rd submission materials

**kelanie.**

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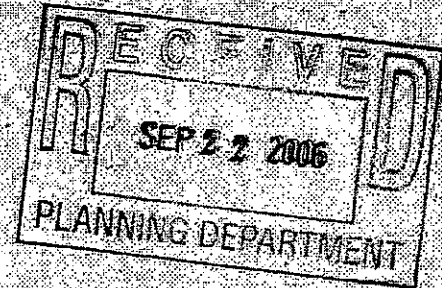
**A-14**

Melanie L. Wellman, Planner  
Loudoun County Department of Planning  
Harrison St., SE., 3rd Floor, Mailstop #62  
Falls Church, VA 22044-7000

703.771.5496  
[www.loudoun.gov/planning](http://www.loudoun.gov/planning)

County of Loudoun  
Department of Planning  
MEMORANDUM

DATE: September 22, 2006  
TO: Rodion Iwanczuk, Project Manager  
Land Use Review  
FROM: Melanie L. Wellman, Planner  
Community Planning



SUBJECT: SPEX 2006-0022 Western High School at Fields Farm

**BACKGROUND**

Loudoun County Public Schools, the applicant, on behalf of Loudoun County Board of Supervisors, the property owner, is requesting a Special Exception to allow a high school on a portion of the Fields Farm Property. The Fields Farm Property is approximately 230 acres and is located on Route 711 (Alder School Road), north of Purcellville and the Route 7 Bypass, between Route 690 (Hillsboro Road) and Route 611 (Purcellville Road). The site is zoned JLMA-3 (Joint Land Management Area - 3), and the area of the parcel where the high school is proposed is planned for residential uses. The high school is proposed for 145.75 acres of the 230-acre property. Mountain View Elementary School is currently located on the northwest portion of the Fields Farm Property. Recreational uses for the Upper Loudoun Youth Football League have been approved for the southern portion of the property, south of the future collector road. Uses surrounding the property include large residential lots and subdivisions as well as industrial uses to the south.

The Loudoun County Board of Supervisors purchased the Fields Farm Property in 2000. Mountain View Elementary School was constructed on the northwest portion of the property and opened in the Fall of 2003. During that time there were discussions about locating a high school on the property as well. In June 2006, the Board of Supervisors passed a motion to provide its consent and authorization to participate in a Special Exception application for Western High School at Fields Farm and directed staff to concurrently review the site and construction plans for the high school and related improvements while the Special Exception request was under review.

The high school is proposed to be approximately 260,000 square feet and have a capacity for 1,600 students. Facilities associated with the high school are also



proposed on the Fields Farm Site, including a high school football stadium, concession stands, ticket booths, storage buildings, a field house, baseball dugout, and other athletic fields. Both pervious and grass parking has been proposed. The applicant states a desired opening of Fall, 2008.

GIS records indicate that river and stream corridor resources, including wetlands, minor floodplain, and some vegetation, are all present on the subject site. There are also existing drainfields and wells on the property. The Planning Department has agreed to delay the submittal of a Phase 1 Archeological Survey with the agreement that the survey will be submitted and staff be able to complete their review prior to the applicant's response to staff's comments.

### **COMPLIANCE WITH THE COMPREHENSIVE PLAN**

The subject site is located in the Purcellville JLMA and is planned for residential uses.

The property is governed by the policies of the Purcellville Urban Growth Management Plan (PUGAMP). The PUGAMP is the Town and County's jointly adopted long-range development plan for the area within the JLMA. The Revised General Plan (Plan) states that "development within the JLMA will comply with the PUGAMP as amended" (Revised General Plan, Policy 1, p. 9-23). The County and the Town of Purcellville are in the process of updating the 1995 PUGAMP, although work on the draft plan is currently on hold. The Revised General Plan policies also apply with respect to environmental policies in Chapter 5 and towns policies in Chapter 9. However "any policies or amendments of the Revised Plan that conflict with the PUGAMP must be reviewed and approved by both the Town and the County" (Revised General Plan, text, p. 1-3).

The policies of the Loudoun County Bicycle and Pedestrian Mobility Master Plan (Bike/Ped Plan) also apply.

### **ANALYSIS**

#### **LAND USE**

The County and the Town of Purcellville have jointly planned the land uses and developed policies for the JLMA surrounding the Town. The JLMA is referenced in the PUGAMP as the Urban Growth Area (UGA).

The PUGAMP designates the subject site for very low density residential (up to 0.33 units/ac.) as an interim use (PUGAMP, Figure 9, p. 34) and low density residential (1-3 units/ac.) as the ultimate land use (PUGAMP, Figure 8, p. 33).

A full complement of public facilities and services will be provided to serve a growing population in the Purcellville area (PUGAMP, Policy 3, p. 47). The Town of Purcellville will generally be the preferred location for new public facilities unless a suitable site is

not available in the Town, or the facility (such as an elementary school) is designed to serve a local or neighborhood population (PUGAMP, Policy 2, p. 47).

The preferred location for new school sites is shown on Figure 10, p. 48 (PUGAMP, Policy 2, p. 47). The Town of Purcellville and the JLMA currently have four schools – two elementary, one middle, and one high school. Emerick Elementary is located within the Town of Purcellville. The other elementary school, Mountain View, is located in the JLMA on the Fields Farm site, just to the north of the proposed high school, which is the subject of this application. Blue Ridge Middle School and Loudoun Valley High School are located within the Town. These schools serve not only students from Purcellville, but also from all areas of Western Loudoun. In addition, Harmony Intermediate School, located between Purcellville and Hamilton, serves eighth and ninth grade students from Purcellville and western Loudoun. Upon the opening of a second high school in western Loudoun, Harmony Intermediate School will serve as a second middle school for students in sixth through eighth grades.

The Town of Purcellville and the JLMA, like many areas of the County, are experiencing a surge in residential development. An increase in residential development triggers the need for an increase in public facilities, including schools. According to the Existing and Proposed School Locations Map (PUGAMP, Figure 10, p. 48) the high school was proposed to be located inside the JLMA (depicted with a white 'H' on the map). However, since the time the map and PUGAMP were adopted in May 1995, residential subdivisions have developed in the general area where the 'H' is depicted for a high school. Due to unanticipated growth in Purcellville and throughout western Loudoun, the Loudoun County School Board has determined an immediate need for an additional high school in the area. The Statement of Justification explains that the proposed school will serve a large area of Western Loudoun; however, the majority of the student population is situated along the Route 7 corridor. Placing the school at Fields Farm will provide a central location for the student population.

**Loudoun County Public Schools recognizes the need for an additional high school in western Loudoun, and in particular in the Purcellville JLMA, as this is a central location along Route 7, a primary transportation corridor. Per the PUGAMP policy of providing a full complement of public facilities and services to the Purcellville area, the subject site would be an appropriate location for a high school. The need for a future high school was determined when PUGAMP was approved in 1995, as shown on the Existing and Proposed School Locations Map. Since a high school is not able to be constructed in the location depicted on the map due to the development of residential uses, the proposed high school at Fields Farm appears to be in an appropriate location in terms of land use. Furthermore, the Fields Farm Property was purchased by the County for public facilities purposes, as it currently houses an elementary school. The location of the proposed high school is consistent with PUGAMP policies that encourage the concentration of public and facility service development around the Town.**

***Staff supports the proposed high school use at Fields Farm. However, other issues remain and should be addressed. Staff's primary concerns are water conservation, drainfields, and the transportation network. These and other issues are outlined below.***

## **SITE DESIGN**

### **1. Transportation Network**

Residential communities may include compatible civic uses such as churches, schools, community centers, elementary schools, libraries, or similarly scaled uses. Uses that are designed to serve a regional population (such as a middle school or high school) should have access to a collector road or arterial (PUGAMP, Policy 8c, p. 37). The proposed major collector road is depicted on the Ultimate Transportation Network Map (PUGAMP, Figure 11, p. 54).

The SPEX plat depicts the conceptual alignment for the future North Collector Road with a 70 foot right of way. However, the application does not include information regarding whether the applicant intends to contribute to the construction of that road. The North Collector Road is anticipated to serve much of the commuter traffic resulting from the residential development in the area.

***Staff recommends that the application state any future intentions for the North Collector Road, including whether the applicant intends to contribute to its construction and whether access will ultimately be provided to the road.***

### **2. Stormwater Management / Best Management Practices**

Plan policies call for "appropriate standards to protect natural streams from the harmful effects of increased stormwater volume and velocity resulting from harmful development" (Revised General Plan, Policy 5, p. 5-17). Furthermore, the County promotes water conservation through low impact development techniques, which integrate hydrologically functional designs with methods for preventing pollution and treat the pollution as close to the source as possible. (Revised General Plan, Policy 2, p. 5-17).

No stormwater management (SWM) facilities or best management practices (BMPs) techniques have been depicted on the SPEX plat. Stormwater management and BMPs would help the impaired creek and control runoff that would result from the increase of impervious cover.

***Staff recommends the applicant commit to using an infiltration BMP on site and using low impact development techniques, per Plan policy.***



### 3. Bicycle and Pedestrian Access

All land development applications are encouraged to provide off-street bicycle and pedestrian circulation and pathway systems that augment the on-street system in order to provide the highest quality linkages to the primary destinations and reduce travel distances for pedestrians and bicyclists (Bike/Ped Plan, Policy 3, p. 33). All land development applications shall provide bicycle and pedestrian access through the development in various directions, so as to prevent it from becoming a barrier between other trip origins and destinations in the community (Bike/Ped Plan, Policy 6, p. 33).

The Fields Farm Property is 230 acres, with the high school comprising approximately 145 acres. Given that the site is so large and that athletic facilities appear to be widely dispersed, adequate pedestrian and bicycle accommodations and connections should be established.

***Staff recommends a well-connected and safe pedestrian and bicycle circulation system throughout the entire site.***

***Specifically, staff recommends a trail connection between the football stadium and the large high school parking lot, as it is anticipated that people would be using that lot for game parking. Staff recommends a span-style bridge or boardwalk be incorporated into the design of the trail over the floodplain. In addition, staff recommends an 8 – 10 foot wide multi-use trail along the site frontage of Route 711 and Route 690 to connect the Fields Farm Property with the Town of Purcellville. Furthermore, staff recommends sidewalks on both sides of all roads to ensure easy access for pedestrians traveling between the high school and associated facilities.***

### 4. Lighting

The Plan states that the "beauty of the County's night sky is threatened by excessive and improper lighting" (Revised General Plan, text, p. 5-42). The Lighting and Night Sky Policies of the Revised General Plan promote the "use of lighting for convenience and safety without nuisance associated with light pollution (Revised General Plan, Policy 1, p. 5-42).

The Statement of Justification states that "building lights will be cutoff and fully shielded lighting fixtures, directed inward and downward toward the interior of the property. The lighted playing fields and stadium will be positioned and buffered to ensure lighting will not adversely impact surrounding properties. In addition, the athletic field lighting will incorporate a reflector technology system that directs light onto the field, minimizes glare and spillage, and reduces energy and maintenance costs." Staff commends the applicant for the attention given to lighting. Such measures could help ensure compatibility with the neighboring uses and fulfill County policies.

Due to surrounding residential development, conditions of approval should be applied to this application to ensure that lighting does not adversely impact adjacent residents.

***Staff recommends the applicant commit to the following lighting measures as conditions of approval:***

- ***That the site, building, and parking lot lighting be designed and constructed with full cut-off and fully shielded fixtures so that the light will be directed inward and downward toward the interior of the property, away from adjacent streets and properties, is confined to the site, and has illumination levels that are no greater than necessary for a light's intended purpose;***
- ***That parking lot lighting be turned off within one hour following the end of evening activities, or 12 a.m., whichever occurs first; and,***
- ***That athletic field lighting be directed inward and downward toward the fields and that athletic field lighting incorporate a reflector technology system that directs light onto the fields and minimizes glare, spillage, skyglow, and deterioration of the nighttime environment.***

## **5. Noise**

Loudoun County has many employment and activity centers that create various levels of noise and require consideration and, in some cases, abatement to meet public welfare and health objectives (Revised General Plan, Aural Environment text, p. 5-42).

A public address system is proposed with the football stadium, baseball field, and softball field. The Statement of Justification explains that the public address system is not intended to be used beyond 12 a.m. The noise emanating from the public address system at these various athletic fields could have an impact on nearby residents, particularly in the late-night hours.

***Staff defers to Zoning Administration regarding the termination of the public address systems after 12 a.m. as well as the acceptable dBA level. Staff recommends the applicant commit to a public address system which will not cause disruption to nearby residents.***

## **EXISTING CONDITIONS**

The Town and the County support the continued application of relevant Revised General Plan natural and cultural resource policies to protect key environmental resources in the Purcellville UGA (PUGAMP, Policy 1, p. 12).

## 1. Water Conservation Measures

Groundwater supplied through wells and springs owned by the Town of Purcellville is an important source of drinking water in the Purcellville area. In addition, residents currently living in the Purcellville UGA depend on individual wells as their source of drinking water. Water supply was specifically mentioned as a concern by citizens at public workshops held in Purcellville. The County and Town must take precautions to protect groundwater as a fragile resource since area residents depend on groundwater as their water source (PUGAMP, text, p. 12). Furthermore, the Revised General Plan states that "the County will develop, implement, and maintain a wellhead protection program to protect groundwater from contamination and ensure an adequate level of drinking water quality for the residents of rural Loudoun and western Loudoun Towns that are dependent on groundwater as a water source" (Revised General Plan, Policy 2, p. 5-18).

According to the County's GIS records and the Existing Conditions plat submitted with the application, wells exist on site. No information has been submitted regarding specific wells that will serve the high school. The site is to be entirely supported by well water. Staff is concerned about the risk of the lowering of the water table given the limited water resources in this area of the County, as well as the risk of contamination due to drainfields on the site. A major cause of groundwater contamination is outflow for on-site sewage disposal, such as drainfields. When these systems are improperly constructed or maintained the groundwater could become contaminated with bacteria, nitrates, viruses, and chemicals. In addition, a pumping well could create a cone of depression, which ultimately could lead to a localized lowering of the water table.

The Statement of Justification states that, "no adverse impact to groundwater supply is anticipated" but the application should elaborate on how it will ensure groundwater is protected. Plan policies encourage the use of water conservation measures as well as measures to protect water quality.

***Staff recommends the application provide information regarding the well and wellhead protection, depth of wells, location of neighboring wells, and whether they are up gradient from septic fields. Staff recommends the application implement water conservation measures to protect water quality, pursuant to Plan policy of ensuring protection from contamination and maintaining an adequate level of drinking water for residents.***

***Staff defers to Building and Development regarding the specific measures that could be implemented into the design of the site for water conservation, such as those used in the design of schools in neighboring jurisdictions.***

## 2. Drainfields

The use of communal, interim or alternative wastewater treatment systems and communal water supply systems will generally not be permitted in the UGA (PUGAMP,



Policy 3, p. 45). There are existing drainfields on site, as well as several possible drainfield locations. The application does not include any information on the drainfields, including whether the existing drainfield for the elementary school will be shared with the high school. Staff is especially concerned with the location of one particular drainfield, as it appears to be located within the conceptual alignment for the North Collector Road to the south of the site. Detailed information regarding the drainfields on site should be submitted for staff's review.

***Staff requests additional information regarding the drainfields on site. This information should include details on the capacity, water gradients, locations, measures taken to preclude contamination of nearby wells, whether the drainfields are shared with the elementary school, and whether a drainfield is proposed in the conceptual alignment for the North Collector Road.***

***In addition, if drainfields are proposed they should be labeled as "drainfields" on the SPEX plat and the word "possible" should be omitted.***

### **3. River and Stream Resources & Floodplain**

#### **A) Reforestation Efforts**

The County's river and stream corridors are the largest system in the Green Infrastructure, comprising the largest natural ecosystem, supporting air quality, water quality and biological diversity. In addition to the rivers and streams that drain 100 acres or more, the corridors include 100-year floodplains, adjacent steep slope areas, wetlands, riparian forests, and a 50-foot Management Buffer surrounding the floodplains (Revised General Plan, text, p. 5-5 and Policy 2, p. 5-6).

The County recognizes the river and stream corridors as an essential natural element of the regional ecosystem. The County will actively pursue a joint public and private partnership for the preservation, conservation, restoration, and management of river and stream corridor resources (Revised General Plan, Policy 8, p. 5-9).

The Plan lists the South Fork Catoctin Creek as one of the nine stream segments in Loudoun County on the state's impaired waters list by the Virginia Department of Environmental Quality (DEQ) for excessive levels of fecal coliform. In addition, erosion and stream scouring could occur as a result of a large increase in impervious cover and stormwater (Revised General Plan, text, p. 5-12). The County will protect the headwaters of the Catoctin and Goose Creeks by establishing appropriate regulations for the Catoctin to limit diversions of water from the headwaters and to prevent stream pollution (Revised General Plan, Policy 3, p. 5-17).

A minor floodplain traverses the Fields Farm property, and is a headwater tributary to the South Fork of Catoclin Creek. It appears from the SPEX plat that the proposed school and associated facilities will not impact the river and stream corridor resources, with the exception of the road leading to the high school through a narrow section of the floodplain. Staff commends the applicant for avoiding the majority of river and stream resources.

Staff notes that there have been previous restoration efforts on the western half of the stream corridor in the form of riparian buffer planting and tree shelters for animal and pest control. Reforestation along the remainder of the corridor could help prevent potential stream pollution of the South Fork Catoclin Creek.

***Staff recommends that the previous reforestation effort along the stream corridor be reinspected to determine the current state of the tree shelters. In addition, staff recommends that reforestation continue throughout the entire riparian corridor, from the northern property line to the southern property line. Staff recommends a reforestation plan be submitted for staff's review.***

***Staff defers to Building and Development regarding specific guidance on how to implement reforestation efforts throughout the corridor.***

#### **B) River and Stream Resources Near Proposed Stadium**

Protecting groundwater and surface water (e.g., streams and wetlands) from contamination and pollution is a major water resource issue for the County (Revised General Plan, text, p. 5-12). The County supports the federal goal of no net loss to wetlands in the County (Revised General Plan, Policy 23, p. 5-11). The County will actively pursue a joint public and private partnership for the preservation, conservation, restoration, and management of river and stream corridor resources (Revised General Plan, Policy 8, p. 5-9).

In addition to the river and stream corridor resources spanning the center of the site, there is existing minor floodplain and wetlands between Route 711 and the proposed football stadium. While all of the development appears to be located outside of the river and stream corridor resources, it is possible that these resources could be impacted by vehicular traffic if vehicles "spill over" into the river and stream resource area and use it as an unofficial overflow parking area. Also, it is unclear whether there is a fence or other barrier preventing traffic from driving off Route 711 as a shortcut to the stadium. Staff is concerned that vehicular parking and traffic could negatively impact this sensitive environmental area.

***Staff recommends that the application protect the river and stream corridor resources between Route 711 and the football stadium and ensure that they are not impacted by parking or vehicular traffic.***



### **COMMISSION PERMIT**

In a letter dated May 22, 2006 the Town of Purcellville's Director of Planning and Zoning stated that it is the Town's belief that Loudoun County would have to obtain a Commission Permit for the proposed high school, as there is not a high school depicted for the Fields Farm Property according to the Existing and Proposed School Locations Map in Figure 10 of PUGAMP. This letter was appealed by the County and School Board to the Purcellville Board of Zoning Appeals, and was overturned. In a determination letter dated June 22, 2006, the Loudoun County Zoning Administrator issued a determination that a Commission Permit would not be required, as a public high school is a feature depicted on Figure 10, which shows general locations for schools in the JLMA. The Town has appealed this determination to the Loudoun County Board of Zoning Appeals.

*The issue of whether a Commission Permit is needed for this application is yet to be resolved, and is scheduled to be discussed September 28, 2006 in front of the Loudoun County Board of Zoning Appeals.*

### **RECOMMENDATION**

The Loudoun County Public Schools recognizes the need for an additional high school in western Loudoun, and has identified the Fields Farm Property in the Purcellville JLMA as the most appropriate location for the facility. A future high school in the JLMA was included within the PUGAMP when it was adopted in 1995, as shown on the Existing and Proposed School Locations Map. The proposed high school is sited in an appropriate location in terms of land use, is consistent with the PUGAMP policies of providing a full complement of public facilities and services to a growing population in the Purcellville area, and is depicted on the Existing and Proposed School Locations map in the PUGAMP. However, significant issues regarding water conservation, drainfields, and the transportation network remain. Staff is unable to fully evaluate the application until the following information is provided and reviewed:

1. State any future intentions for the North Collector Road, including whether the applicant intends to contribute to its construction, and whether access will ultimately be provided to the road;
2. Commit to using an infiltration BMP on site and using low impact development techniques, per Plan policy;
3. Provide a bicycle and pedestrian trail connection between the football stadium and the large high school parking lot, with a span-style boardwalk or bridge incorporated into the design of the trail over the floodplain;

4. Provide an 8 – 10 foot wide multi-purpose trail along the site frontage of Route 711 and Route 690 to connect the Fields Farm Property with the Town of Purcellville;
5. Provide sidewalks on both sides of all roads to ensure easy access for pedestrians traveling between the high school and associated facilities;
6. Commit to the following lighting measures as conditions of approval:
  - That site, building, and parking lot lighting be designed and constructed with full cut-off and fully shielded fixtures so that the light will be directed inward and downward toward the interior of the property, away from adjacent streets and properties, is confined to the site, and has illumination levels that are no greater than necessary for a light's intended purpose;
  - That parking lot lighting be turned off within one hour following the end of evening activities, or 12 a.m., whichever occurs first; and,
  - That athletic field lighting be directed inward and downward toward the fields and that athletic field lighting incorporate a reflector technology system that directs light onto the fields and minimizes glare, spillage, skyglow, and deterioration of the nighttime environment.
7. Commit to a public address system which will not cause disruption to nearby residents;
8. Provide information regarding the well and wellhead protection, depth of wells, location of neighboring wells, and whether they are up gradient from septic fields;
9. Implement water conservation measures to protect water quality, pursuant to Plan policy of ensuring protection from contamination and maintaining an adequate level of drinking water for residents;
10. Provide additional information regarding drainfields on site, including information on capacity, water gradients, locations, measures taken to preclude contamination of nearby wells, whether the drainfields are shared with the elementary school, and whether a drainfield is proposed in the conceptual alignment for the North Collector Road;
11. Depict drainfields on the SPEX plat as "drainfields", omitting the word "possible";
12. Reinspect the previous restoration effort along the stream corridor to determine the state of the tree shelters. If needed, refer to guidance from Building and Development regarding the augmentation of that effort;

13. Reforest the remainder of the riparian corridor on site, from the northern property line to the southern property line;

14. Submit a reforestation plan for staff's review; and

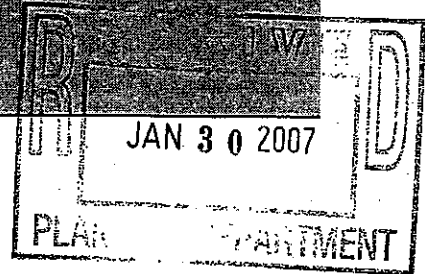
15. Ensure that the river and stream corridor resources between Route 711 and the football stadium are not impacted by parking or vehicular traffic;

Staff would be happy to meet with the applicant to discuss these issues.

cc: Julie Pastor, AICP, Director, Planning  
Cynthia L. Keegan, AICP, Program Manager, Community Planning  
Susan Berry Hill, Program Manager, Community Information & Outreach

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County of Loudoun  
Department of Planning  
MEMORANDUM



**DATE:** January 30, 2007  
**TO:** Rodion Iwanczuk, Project Manager  
**FROM:** Heidi Siebert *HS*, Historic Preservation Planner, Community  
Information and Outreach

**SUBJECT:** SPEX 2006-0022 Western High School at Fields Farm

Staff has reviewed the submitted Phase II report for archaeological site 44LD 1393, a mid 19<sup>th</sup> to early 20<sup>th</sup> century domestic site prepared by Thunderbird Archeology and dated November 2006, as well as the architectural evaluation of architectural resource 053-5596 prepared by History Matters dated August 2006.

Archaeological site 44LD1393 is determined by the consultant to be ineligible for listing in the National Register of Historic Places. Phase II investigation of the site included the excavation of 6 test units. Artifacts recovered were found primarily in plowed contexts and no additional archaeological investigation is recommended.

Architectural resource 053-5596 is a complex associated with site 44LD1393 and represents the evolution of a family farm operation from mixed grains to dairy production. The complex was first recorded in 2003 and at that time was thought to be potentially eligible for listing in the National Register of Historic Places. The 2006 History Matters evaluation of the complex reveals that the structures have fallen into such a state of disrepair that the resource no longer retains sufficient architectural and structural integrity to be considered eligible. No additional architectural evaluation of this complex is recommended.

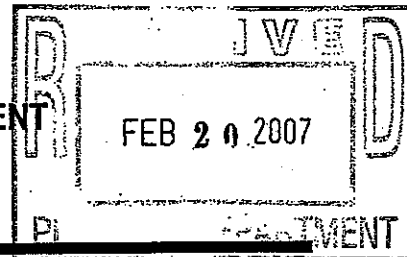
Staff concurs with the findings and recommendations presented in the consultants' reports. No additional evaluation or mitigation of these resources is warranted.

ATTACHMENT 1 **b**

A-29

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**COUNTY OF LOUDOUN**  
**DEPARTMENT OF BUILDING AND DEVELOPMENT**  
**ZONING ADMINISTRATION REFERRAL**



**DATE:** February 20, 2007

**TO:** Rodion Iwanczuk, Project Manager, Planning Department

**FROM:** Adrienne Freed Kotula, Planner, Zoning Administration *APR*

**THROUGH:** Marilee L. Seigfried, Deputy Zoning Administrator *mls*

**CC:** Melinda Artman, Zoning Administrator

**CASE NUMBER AND NAME:** SPEX-2006-0022 Western High School at Fields Farm  
Third Submission Referral

**TAX MAP/ PARCEL  
NUMBER (MCPD):** /35/////21-1/ (522-29-5928-001)  
/35/////21-2/ (522-29-5928-002)

The applicant, the Loudoun County School Board, is proposing a public high school and associated facilities within the JLMA-3 (Joint Land Management Area-3) zoning district under the Revised 1993 Loudoun County Zoning Ordinance ("Ordinance"). The following issues have been identified and must be addressed in order for the application to be in conformance with the Ordinance.

**A. CRITICAL ISSUES**

No critical issues have been identified with this application.

**B. OTHER ISSUES**

**Section 5-1400 Buffering and Screening** – Staff acknowledges that the applicant intends to provide the required Type II Buffer surrounding the high school use, however, the area in which this buffer is to be provided continues to be unclear on the Special Exception Plat (especially along the eastern portion of the site). Additionally, the applicant has failed to request the proper administrative modification of the buffer location in accordance with Section 5-1409.



**Additional Comments:**

- The size of the proposed high school building is unclear. The tabulations state that the building is to be "256,467 square feet, not to exceed 262,000 square feet" yet the Special Exception Plat states that the building shall be "256,467 square feet." If it is the applicant's intent to have a building which will not exceed 262,000 square feet, this is the number that needs to be shown in all areas, and no other. This is necessary for clarity in the future administration of the site.

**C. CONDITIONS OF APPROVAL**

- Staff recommends the inclusion of a condition requiring substantial conformance with the Special Exception Plat, to aid in the ease of administration.
- Staff recommends the inclusion of a condition requiring substantial conformance to the pedestrian access map shown on Sheet C4.0.
- Staff recommends the inclusion of a condition requiring the necessary school related transportation improvements (identified in the traffic study) be provided in a phased manner agreeable to OTS and VDOT.
- Staff recommends a condition requiring that the primary construction entrance for the high school site be the existing driveway to the south of the Dowling property (MCPI: 487-45-2474). If VDOT requires the construction of turn lanes for the construction entrance, the existing Elementary School entrance may be used, however, all construction traffic must be safely segregated from the pick up and drop off areas of the existing school.
- Staff recommends a condition requiring the proposed enhanced evergreen buffers in the locations shown on the Special Exception Plat in addition to the required Type II Buffer. These evergreen buffers shall be 15 feet in depth and include six evergreen trees (with a minimum height of six feet) per 100 linear feet.
- Staff recommends a condition requiring a retaining wall, fencing and landscaping around the proposed water treatment facility to shield the users of the adjacent football stadium.
- Staff recommends a condition requiring that site, building and parking lot lighting shall be designed and constructed with cut-off and fully shielded fixtures so that the light will be directed inward and downward toward the interior of the property, away from adjacent streets and properties.
- Staff recommends a condition requiring that parking lot lighting shall be turned off

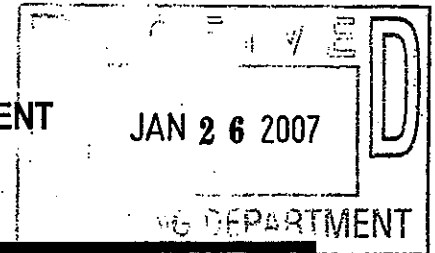


within one hour following the end of evening activities, or 11 p.m., whichever occurs first.

- Staff recommends a condition requiring that athletic field lighting be directed inward and downward toward the fields. Athletic field lighting shall incorporate a reflector technology system that directs light onto the field and minimizes glare and spillage.
- Staff recommends a condition requiring that installation of the outdoor public address system be limited to the stadium/track and the high school baseball and softball fields. Noise emanating from this system cannot exceed 60 dBA at the property boundaries and use of the system shall be prohibited after 11 p.m.
- Staff recommends a condition requiring the proposed 50 foot floodplain conservation buffer. The proposed sanitary facility, the proposed extended detention facility and all proposed roadways/walkways for the high school may encroach into this buffer as shown on the Special Exception Plat.

The Zoning Administration has no further comments at this time.

**COUNTY OF LOUDOUN**  
**DEPARTMENT OF BUILDING AND DEVELOPMENT**  
**ZONING ADMINISTRATION REFERRAL**



**DATE:** January 26, 2007

**TO:** Rodion Iwanczuk, Project Manager, Planning Department

**FROM:** *AFK*  
Adrienne Freed Kotula, Planner, Zoning Administration

**THROUGH:** *me*  
Marilee L. Seigfried, Deputy Zoning Administrator

**CC:** Melinda Artman, Zoning Administrator

**CASE NUMBER AND NAME:** SPEX-2006-0022 Western High School at Fields Farm  
Second Submission Referral

**TAX MAP/ PARCEL  
NUMBER (MCPI):**

/35/////21-1/ (522-29-5928-001)  
/35/////21-2/ (522-29-5928-002)

The applicant, the Loudoun County School Board, is proposing a public high school and associated facilities within the JLMA-3 (Joint Land Management Area-3) zoning district under the Revised 1993 Loudoun County Zoning Ordinance ("Ordinance"). The following issues have been identified and must be addressed in order for the application to be in conformance with the Ordinance.

**A. CRITICAL ISSUES**

No critical issues have been identified with this application.

**B. OTHER ISSUES**

**Section 2-1204 Minimum Side Yard** – Although a 15' Type II side landscape buffer is required, the proper side yard for the subject property is 10 feet. Correct the plat accordingly.

**Section 2-1206(C)(1) Provision of Sidewalks and/or Trails** – Sidewalks and/or trails *shall* be provided, at a minimum, along one side of all streets. No sidewalk is shown along the entire frontage of Alder School Road.

**Section 2-1206(C)(2) Sidewalk and/or Trail Connections** – Connections should be made to all existing and/or planned sidewalk/trail systems adjacent to the property. Staff notes that no pedestrian connection has been made to the property immediately south of the site.

**Section 4-1500 Floodplain Overlay District** – Update General Note 4 on Sheet C1.0 to state that portions of the property are located within the minor floodplain and that those portions are within the Floodplain Overlay district and subject to the requirements of Section 4-1500.

**Section 5-900 Setbacks from Specific Roads** – Add reference, on Sheet C1.0 to the fact that a 200' building setback and 100' parking setback is required from the Route 7 Bypass.

**Section 5-1100 Off-Street Parking and Loading Requirements** – General Note 8 on Sheet C1.0 incorrectly references Section 5-1200. Section 5-1100 is the Section which regulates parking and therefore the note must be updated.

**Section 5-1400 Buffering and Screening** – The statement of justification states that a Type II Buffer will be provided surrounding the Special Exception use, yet the plat does not show this. Show the required Type II Buffer surrounding the high school use. As this lot is a through lot, there is no rear buffer requirement, but two front buffers (along the roads) and two side buffers instead.

**Section 6-1310(E) Issues for Consideration** – The layout of the site and the existing natural features do not mitigate all potential impacts of the proposed high school use upon adjacent residential uses. Discuss, in more detail, the measures that will be taken to mitigate the impacts on adjacent residential uses.

**Section 6-1310(F) Issues for Consideration** – The applicant has not provided the Type II Buffer referenced within the Statement of Justification. Provide the Buffer referenced.

**Sections 6-1310(J) & (O) Issues for Consideration** – The applicant has not addressed how the traffic impacts identified within the traffic study from the school use will be mitigated.

**Section 6-1310(R) Issues for Consideration** – At this time, no study stating that adequate wastewater disposal will be available is referenced.

**Section 6-1310(T) Issues for Consideration** – Specifically address what will be done to mitigate the impact of construction traffic upon the surrounding neighborhoods as well as what will be done to mitigate the impacts upon the existing elementary school on-site.

**Additional Comments:**

- Update general note 16 on Sheet C1.0 to state that the proposed use is a high school, as this reflects a use which is listed within the Zoning Ordinance.
- Within the zoning requirements table, remove the ± symbols next to the property acreages at the bottom of the table.

- Clarify, within the provided buffer table on Sheet C1.0, that where the evergreen buffers are proposed the landscape buffer shall be a total of 30 feet in depth.
- The Open Space Calculation for the entire parcel (Sheet C1.0) is unclear. The developed and open space areas should be listed separately to clarify which areas are added and/or subtracted from the calculation.
- The Open Space Calculation Map (Sheet C5.0) seems to double count acreages. Additionally, there is no legend which identifies the several types of crosshatching that appear on the sheet. Staff recommends removing all of the existing labels, providing one label stating the total developed acreage outside of open space, one label stating the entire open space acreage and one label which identifies the total developed coverage within open space. Providing information in this manner will show that all requirements have been met and will also be clearer than what is currently provided.
- Provide a detail of the proposed evergreen buffer, as this is not a requirement within the Ordinance. Additionally, state the length of the proposed buffers for both of the locations shown.
- The applicant has provided a 50' conservation buffer adjacent to the minor floodplain, yet the proposed high school sanitary facility is located within this buffer. Staff questions the appropriateness of this facility within a conservation buffer.
- Portions of the shot put area are located within the evergreen buffer. Active recreation areas are not permitted within buffers. Remove the shot put area.
- Staff notes that a possible drain field location is labeled close to the conceptual alignment for the Purcellville Route 7 North Collector Road, yet no drainfield is shown.
- Darken the crosswalks shown on the pedestrian access plan (Sheet C4.0) for clarification.
- Staff notes the extreme proximity of the high school water treatment facility to the football field and track. A location further from the field, or landscaping around the facility would be preferable, for safety and security.
- Staff continues to note a lack of sidewalks/trails to the tennis courts and practice fields at the southern end of the property.

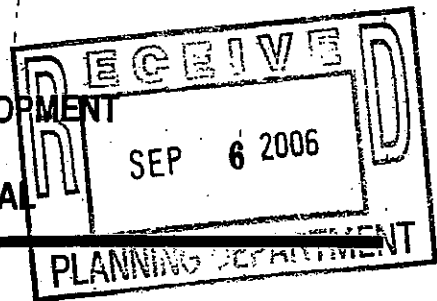
#### C. CONDITIONS OF APPROVAL

- Staff recommends the inclusion of a condition requiring substantial conformance with the Special Exception Plat, to aid in the ease of administration.

- Staff recommends the inclusion of a condition requiring substantial conformance to the pedestrian access map shown on Sheet C4.0 once a trail along Allder School Road has been included.
- Staff recommends the inclusion of a condition requiring that the school related transportation improvements identified within the traffic study be completed prior to the issuance of an occupancy permit for the high school use.
- Staff recommends a condition requiring that the construction entrance for the high school site be the existing driveway to the south of the Dowling property (MCPI: 487-45-2474). The condition should also prohibit the use of the existing elementary school access point by construction traffic. The use of this existing driveway will safely segregate all construction traffic from all existing elementary school traffic, thus ensuring the safety of children, their families and school staff.
- Staff recommends a condition requiring the proposed enhanced evergreen buffers in the locations shown on the Special Exception Plat. Once a detail has been provided, reference to this detail should be included within the condition language.
- Staff recommends a condition requiring that site, building and parking lot lighting shall be designed and constructed with cut-off and fully shielded fixtures so that the light will be directed inward and downward toward the interior of the property, away from adjacent streets and properties.
- Staff recommends a condition requiring that parking lot lighting shall be turned off within one hour following the end of evening activities, or 11 p.m., whichever occurs first.
- Staff recommends a condition requiring that athletic field lighting be directed inward and downward toward the fields. Athletic field lighting shall incorporate a reflector technology system that directs light onto the field and minimizes glare and spillage.
- Staff recommends a condition requiring that installation of the outdoor public address system be limited to the stadium/track and the high school baseball and softball fields. Noise emanating from this system cannot exceed 60 dBA at the property boundaries and use of the system shall be prohibited after 11 p.m.
- Staff recommends a condition requiring the proposed 50 foot floodplain conservation buffer.

The Zoning Administration has no further comments at this time.

**COUNTY OF LOUDOUN**  
**DEPARTMENT OF BUILDING AND DEVELOPMENT**  
**ZONING ADMINISTRATION REFERRAL**



**DATE:** September 6, 2006

**TO:** Rodion Iwanczuk, Project Manager, Planning Department

**FROM:** Adrienne Freed Kotula, Planner, Zoning Administration

**THROUGH:** Marilee L. Seigfried, Deputy Zoning Administrator

**CC:** Melinda Artman, Zoning Administrator

**CASE NUMBER AND NAME:** SPEX-2006-0022 Western High School at Fields Farm

**TAX MAP/ PARCEL  
NUMBER (MCPI):** /35/////21-1/ (522-29-5928-001)  
/35/////21-2/ (522-29-5928-002)

The applicant, the Loudoun County School Board, is proposing a public high school and associated facilities within the JLMA-3 (Joint Land Management Area-3) zoning district under the Revised 1993 Loudoun County Zoning Ordinance ("Ordinance"). The following issues have been identified and must be addressed in order for the application to be in conformance with the Ordinance.

**A. CRITICAL ISSUES**

No critical issues have been identified with this application.

**B. OTHER ISSUES**

**Section 2-1204(C), (D) & (E) Yards** – Show the required yards on the Special Exception Plat. The "Zoning Setbacks" table on Sheet C1.0 should be renamed, due to the fact that no setbacks are required, only yards. References to setbacks within the table text should be removed. Additionally, a rear yard is incorrectly listed within the table. As the lot is considered a through lot, there is no rear yard, but two front yards (along the roads) and two side yards. Correct the table.

**Section 2-1204(F) Building Height** – Provide the exact height of the proposed buildings, or, alternately, simply reference that the maximum height of buildings will be thirty-five feet.

**Section 2-1204(G) Minimum Open Space** – Demonstrate that the 1% lot coverage maximum within Open Space has not been exceeded.

**Section 2-1206(C)(1) Provision of Sidewalks and/or Trails** – Sidewalks and/or trails shall be provided, at a minimum, along one side of all streets. No sidewalk is shown along the frontage of Alder School Road.

**Section 2-1206(C)(2) Sidewalk and/or Trail Connections** – Connections should be made to all existing and/or planned sidewalk/trail systems adjacent to the property.

**Section 5-1100 Off-Street Parking and Loading Requirements** – Staff recommends the removal of the parking tabulations on Sheet C1.0. General Note 8 on the same Sheet should be updated to reference this Section.

**Section 5-1400 Buffering and Screening** – Indicate the location and type of buffering to be provided along the boundary of the use on the Special Exception Plat. Staff notes that the buffer table on Sheet C1.0 shows a rear buffer. As this lot is a through lot, there is no rear buffer requirement, but two front buffers (along the roads) and two side buffers instead.

**Section 5-1507 Noise Standards** – Staff notes that the applicant is proposing a public address system within the proposed football stadium, the proposed high school baseball field and the proposed high school softball field. Noise emanating from this system cannot exceed 60 dBA at the property boundaries. Additionally, staff notes that the applicant has proposed to prohibit operation of the public address systems after 12 a.m. Be advised that operation of the public address system between 11 p.m. and 7 a.m. would constitute a violation of §654.02(b)(1) of the Loudoun County Codified Ordinance. Revise the Issues for Consideration Responses and General Note 7 (on Sheet C1.0) accordingly.

**Section 5-1508 Steep Slopes** – Staff notes that County Records indicate no steep slopes on the subject parcel, yet the applicant references the presence of steep slopes in several areas. Please verify the information provided.

**Section 6-1310(E) Issues for Consideration** – The layout of the site and the existing natural features do not mitigate all potential impacts of the proposed high school use upon adjacent residential uses. Discuss, in more detail, the measures that will be taken to mitigate the impacts on adjacent residential uses.

**Section 6-1310(F) Issues for Consideration** – Discuss the measures that are being taken, in terms of landscaping, screening and buffering, to mitigate the impacts upon adjacent parcels rather than simply referencing the plat.

**Sections 6-1310(J) & (O) Issues for Consideration** – Discuss the traffic expected to be generated by the proposed use and how this traffic will be adequately and safely served by roads, pedestrian connections and other transportation services, rather than simply referencing the submitted traffic analysis.

**Sections 6-1310(K) & (S) Issues for Consideration** – It is incorrect for the applicant to state that these issues are not applicable. If the applicant is not going to preserve structures and does not anticipate the generation of offensive odors as part of the proposed use, these facts should be stated.

**Section 6-1310(M) Issues for Consideration** – The applicant states that no adverse impact on the groundwater supply is anticipated, yet the project is to be supported entirely by well water. Discuss what is to be done to counteract the impact upon the current groundwater supply.

**Section 6-1310(R) Issues for Consideration** – The applicant should specifically reference the studies that have been done to demonstrate the fact that adequate on-site water and wastewater systems will be available.

**Section 6-1310(T) Issues for Consideration** – Specifically address what will be done to mitigate the impact of construction traffic upon the surrounding neighborhoods.

**Additional Comments:**

- On Sheet C3.0 add a label within the legend for the evergreen trees shown within the additional 15' evergreen buffer.
- Highlight the area subject to this Special Exception within the Vicinity Map on Sheet C0.0.
- Within the Zoning Requirements table, clarify the fact that the portion of the subject parcel that is zoned M-1 is located within the Town of Purcellville.
- Provide maximum building square footages within the gross square footage and building coverage tables on Sheet C1.0 rather than the approximations currently provided.
- Storage buildings, ticket stands, dugouts, etc. are referenced within the application materials, yet none of these buildings are labeled on the Special Exception plat. Label all referenced structures.
- Staff notes that a possible drain field location is within the conceptual alignment for the Purcellville Route 7 North Collector Road.
- Several of the elevations submitted for the high school building lack labeling. Submit elevations which contain labels.
- Staff notes that there is no sidewalk/trail leading into the football stadium from either of the parking lots adjacent to it. Staff also notes a lack of sidewalks/trails to the tennis



courts and practice fields at the southern end of the property.

- Clarify within the adjacent owners table on Sheet C1.0 that only adjacent owners along the side property lines are listed.

### C. CONDITIONS OF APPROVAL

- Staff recommends the inclusion of a condition requiring substantial conformance with the Special Exception Plat, to aid in the ease of administration.
- Staff recommends a condition requiring the proposed enhanced buffers along the northern and eastern property lines
- Staff recommends a condition requiring that site, building and parking lot lighting shall be designed and constructed with cut-off and fully shielded fixtures so that the light will be directed inward and downward toward the interior of the property, away from adjacent streets and properties.
- Staff recommends a condition requiring that parking lot lighting shall be turned off within one hour following the end of evening activities, or 12 a.m., whichever occurs first.
- Staff recommends a condition requiring that athletic field lighting be directed inward and downward toward the fields. Athletic field lighting shall incorporate a reflector technology system that directs light onto the field and minimizes glare and spillage.
- Staff recommends a condition requiring that installation of the outdoor public address system be limited to the stadium/track and the high school baseball and softball fields. Noise emanating from this system cannot exceed 60 dBA at the property boundaries and use of the system shall be prohibited after 11 p.m.
- Staff recommends a condition requiring the proposed 50 foot floodplain conservation buffer.

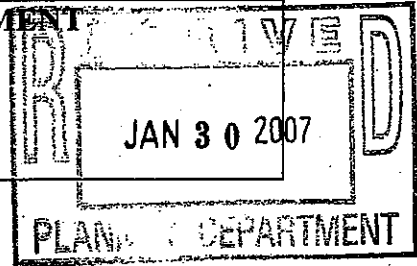
Zoning Administration Staff has no further comments at this time.

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DEPARTMENT OF BUILDING AND DEVELOPMENT

COUNTY OF LOUDOUN

MEMORANDUM



DATE: January 30, 2007

TO: Rodion Iwanczuk, Planning Project Manager

FROM: William Marsh, Environmental Review Team Leader

CC: Melanie Wellman, Community Planner  
Dana Malone, County Arborist

SUBJECT: SPEX-2006-0022 Western High School at Fields Farm

The Environmental Review Team (ERT) has reviewed the above-referenced application. Our comments pertaining to the current application are as follows:

Regarding stream buffers

1. Staff recommends a commitment to reforestation of the river and stream corridors within the school property, including corrective measures to the existing reforestation project near Mountain View Elementary School. Specific reforestation recommendations can be found in the first ERT referral.

Regarding water use efficiency

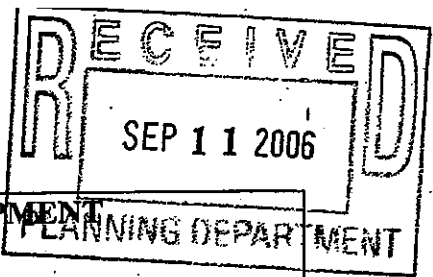
2. In the first referral, ERT recommended water conservation measures that would harvest storm runoff from proposed rooftops and install low flow toilets and no-flow urinals in proposed buildings. School staff has not committed to any water conservation measures beyond existing code requirements, based on two reasons. First, preliminary hydrogeological assessments indicate sufficient water supply from the area currently providing water for Mountain View Elementary School. Second, a prior effort by the schools to install no flow urinals did not work.

ERT recommends reconsideration of this position. It has come to our attention that a storage area for fire protection will be placed near the proposed well site, which is across the minor floodplain from the school. ERT recommends relocating this storage area in closer proximity to the school site, where the volume would be supplied by runoff from the proposed rooftops.

Contrary to the school's experience, low flow toilets and no flow urinals have been easy to maintain and have afforded long term cost savings, based on the experiences of the adjacent jurisdictions and the private company that were

referenced in the prior ERT referral comment. Water supply savings will extend the availability of the proposed well site and potentially offer more water supply to adjacent water users.

Due to the scope of the comments provided, staff requests an opportunity to comment on the subsequent submission of this application. Please contact me if you need any additional information.



DEPARTMENT OF BUILDING AND DEVELOPMENT

PLANNING DEPARTMENT

COUNTY OF LOUDOUN

MEMORANDUM

DATE: September 11, 2006  
TO: Rodion Iwanczuk, Planning Project Manager  
FROM: William Marsh, Environmental Review Team Leader  
CC: Melanie Wellman, Community Planner  
Dana Malone, County Arborist

SUBJECT: SPEX-2006-0022 Western High School at Fields Farm

The Environmental Review Team (ERT) has reviewed the above-referenced application. Our comments pertaining to the current application are as follows:

Regarding stream buffers

1. The minor floodplain that bisects the school site is a headwater tributary to the South Fork Catoctin Creek. Staff recommends that the school construction include a reforestation plan for the river and stream corridor of the minor floodplains on site. Such a plan would support several environmental policies in the Revised General Plan (RGP), including river and stream corridor policy 8 and surface water policy 3, respectively concerning restoration of stream corridor areas by public agencies and headwater protection within the Catoctin Creek watershed. Staff also recognizes previous reforestation efforts that have occurred on this site and recommends augmentation of that effort.

The county arborist provides herein more specific reforestation guidance:

*A. Some forest riparian buffer planting has occurred on either side of the western half of the stream corridor. Tree shelters have been used as means of animal browse protection. Reinspect this area as soon as possible to determine whether or not the tree shelters are vertical and properly installed. If it is determined that the hydrology of the site has caused a significant number of the tree shelters to lean beyond acceptable limits, all shelters should be removed and animal control measures should then be applied as follows:*

*a. Apply a deer repellant such as Repellex, Liquid Fence, or Deer Out in liquid and/or capsule form as prescribed by the manufacturer. Protection will need to be sustained until a*

*minimum average height of 6' has been achieved. While some browse damage may occur year round, protection will be paramount during the winter and early spring months.*

*B. Reforest the remainder of the east/west riparian corridor with native deciduous seedlings appropriate for the site. The planting zone should include all of the floodplain and the 50' buffer area on either side of the floodplain. Planting should occur between February 15 and April 15 and be done on an approximate 12' x 12' spacing.*

*C. Identify any applicable site preparation techniques prior to reforestation.*

*D. Apply deer/animal repellants to the new riparian corridor plantation as previously described.*

*E. It is suggested that all plant material be ribboned or identified in some fashion to help expedite occasional monitoring of the planting for successful establishment.*

Regarding Stormwater Management (SWM) and Best Management Practices (BMP)

2. Unlike previous special exception applications for school construction, no SWM or BMP design is depicted in plan view. Staff encourages commitments to infiltration BMP approaches that will help maintain the hydrologic cycle of this property, consistent with the low impact design practices recommended in Section 5.200 of the Facilities Standards Manual.

Regarding water use efficiency

3. As of this date, no hydrogeologic assessment of potential well water supply has been submitted for review by county staff. Regardless of estimated water yield, county staff encourages installation of water conservation measures into the school design, including a collection system for rainfall that falls on rooftops and installation of low flow toilets and no flow urinals in restrooms. Including water conservation measures within the school would establish a positive example of efficient water use in an area of the county with limited water resources and would be consistent with the Public Facilities goal language on page 3-6 of the RGP and General Water Policy 1 in Chapter 2 of the RGP.

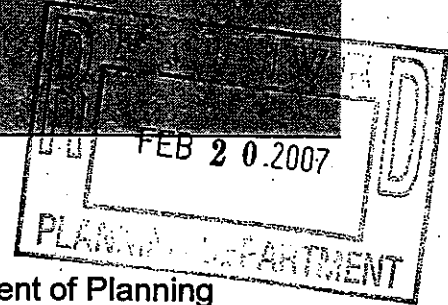
There are local precedents for this recommendation. Such water conservation measures are included with school construction in other jurisdictions, including the rebuilding of TC Williams High School in Alexandria and Northwest School 7 in Montgomery County, Maryland. The firm retained by Loudoun County Schools to perform the Environmental and Threatened Species Habitat Evaluation for this application also uses these measures in its Prince William County office.

Due to the scope of the comments provided, staff requests an opportunity to comment on the subsequent submission of this application. Please contact me if you need any additional information.

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County of Loudoun  
Office of Transportation Services  
**MEMORANDUM**



**DATE:** February 19, 2007  
**TO:** Rodion Iwanczuk, Project Manager, Department of Planning  
**THRU:** Art Smith, Senior Coordinator *AS*  
**FROM:** George Phillips, Senior Transportation Planner *GP*  
**SUBJECT:** SPEX 2006-0022, Western High School at Fields Farm  
Third Referral

**Location:** Southside of Route 711 between Route 690 and Route 611 north of Purcellville

### **Background**

In response to second referral OTS comments dated January 16, 2007, the applicant, the Loudoun County School Board met with Planning and OTS staff and has provided a response letter dated February 15, 2007. Discussed below are the original OTS comments, the applicant's response and whether the issue has been adequately addressed.

### **Transportation Comments**

1. In order to minimize the impact of site traffic turning into/from the proposed entrances on through traffic on Routes 711 and Route 690, the applicant needs to provide right and left turn lanes which meet VDOT standards. Additional right of way may be required. The location of the proposed Route 690 entrance is awkward with respect to the alternative ramp configurations north of Route 7 needs to be taken into consideration. VDOT standards for intersection spacing and the potential for weave/merge issues specifically need to be addressed. The entrance shown on Route 690 may need to be removed or relocated further west. Additional land may also be needed for future interchange designs for Route 7 Bypass/Route 690. **The applicant notes that left and right turn lanes**

will be provided at the school's entrance and has already submitted initial design plans for these and other area improvements. The applicant notes that these may require additional right of way. The applicant also notes that access to Route 690 will be for emergency access only and that it will not be open to the general public for daily use by school related traffic. Provided the applicant is able to secure the necessary right of way and easements for the turn lanes, these issues have been adequately addressed.

2. Several interchange designs are being considered for Route 7 Bypass/Route 690. While a final design has not yet been reviewed and approved by VDOT, the applicant should agree to provide all necessary right of way as needed and accommodate an entrance relocation if needed. At a minimum, the various ramp configurations identified to date must be accommodated. As previously noted, the final interchange design may require changes to the site plan on the south side. The applicant notes that, to date, the County does not yet have a preferred alternative. More importantly, the applicant notes that the proposed special exception being considered does not extend into the land area that might be needed for the Route 7/Route 690 interchange and that this land is already owned by the County. **Issue adequately addressed.**
3. Will the proposed High School site access Route 690 through the Fields property? Please clarify. The applicant notes that this will be for emergency access only and will not be open to school related traffic. All school traffic will access the site via Route 711 to the north. **This Issue has been adequately addressed.**
4. Due to narrow widths in some areas, the typical sections on Route 711 and Route 690 may need to be improved to accommodate the anticipated site traffic and meet VDOT standards. The applicant notes that the only area of concern identified for the Mountain View Elementary School traffic study and the traffic study completed for this application was the Route 711/Route 690 intersection. OTS acknowledges the applicant's response and agrees that this intersection is noted in the previous traffic studies. **However, OTS recommends that VDOT engineering staff weigh in on this potential issue.** The applicant notes that VDOT has already reviewed the application and has responded with memos dated 9/28/06 and January 9, 2007. In addition, a field visit with VDOT staff, the applicant and OTS staff occurred on December 9, 2006. VDOT comments in their memos and the field visit indicated no objection to the use of the proposed location based on the adjacent road network. **Issue adequately addressed.**
5. There is currently no sidewalk or trail on these portions of Route 711 or Route 690. The applicant should provide 8-10' wide multi-purpose trails along the site frontage of Route 711 and Route 690. In addition, the applicant needs to

coordinate pedestrian /bicycle trail access with the Town of Purcellville to the south to facilitate pedestrian access between the Town and this site. **The applicant has revised the plat to show a pedestrian circulation plan on site which adequately addresses the above issue.**

6. In order to accommodate the planned Purcellville Route 7 North Collector Road in the vicinity, the applicant shows dedication of 70 feet of right of way within the southern portion of the property. This is a desirable feature which should be maintained. **The applicant notes that the Fields Farm is owned by the Loudoun Board of Supervisors and that they have reflected the planned Purcellville North Collector Road and have kept the proposed uses from encroaching near the right of way. No outstanding issue.**
7. The traffic study does not assign any site traffic to two unpaved road segments in the vicinity of the proposed school. These are Route 711 between Route 611 and Route 287 and Route 611 between Route 9 and Route 711. OTS understands that the school will have control over the bus routes to and from the site, however, how will the school prevent or discourage students driving their automobiles over these road segments? Please clarify. The applicant notes that there are a large number of unpaved roads in Loudoun County and that the CTP recognizes unpaved roads as having a natural traffic calming effect. In addition, the applicant notes that safe, paved roads have been identified to access the proposed school site and that these roads can adequately serve the proposed use. The choices drivers will utilize to reach the school will be made by the drivers and Loudoun County Schools cannot dictate route choice for automobile drivers. OTS acknowledges the applicants response. OTS would simply encourage the school to inform student drivers of the best routes to use and which to avoid such as Route 711 between Route 287 and Route 611. In addition, the school should insure that school bus routes not utilize this section of Route 711 between Route 287 and Route 611 unless picking up or dropping off students who live on this section of Route 711. **The applicant notes that the Loudoun County Public School Bus Transport Division will restrict bus usage of the unpaved section of Route 711 between Routes 287 and 611 except to pick up/drop off students or unless traffic conditions warrant use of the unpaved road section due to accidents and major tie ups on other routes. Issue adequately addressed.**
8. On page 17 (Table 4) of the traffic study, a series of recommended transportation related improvements are listed for the proposed high school. The traffic study divides the recommended improvements into those warranted directly by the proposed high school and those warranted by existing/other background traffic growth. These are as follows:

Background Traffic

- Traffic signals at the Business Route 7 and the Harmony Middle School, Route 287 and 21<sup>st</sup> Street/20<sup>th</sup> Street/Route 690 intersections and the Route 287/Hirst Drive intersection. In addition, turn lanes are recommended at the Business Route 7/Route 287, Route 287/Hirst Drive, Hirst Drive/Maple Avenue, Hirst Drive/Route 690, and Main Street and 32<sup>nd</sup> Street, 23<sup>rd</sup> Street, 21<sup>st</sup>/20<sup>th</sup> Street/Route 690 and Hatcher Avenue intersections.

### High School Traffic

- Turn lanes at the Hirst Drive/Hatcher Avenue intersection, the Route 690/Route 9 intersection and Alder School Road (Route 711)/proposed site access. In addition, the traffic study notes that a 100' roundabout is needed at the Route 690/Alder School Road intersection.

VDOT needs to comment on the proposed roundabout at the Route 711/Route 690 intersection as compared with a possible future signal with turn lanes. The roundabout will require additional right of way to be obtained. These options also need to be weighed in light of the sight distance problems at this intersection.

Please note that a future interchange (beyond the proposed 2008 opening of the high school) at the Route 7 Bypass/Route 690 crossing would help to divert some traffic from parallel facilities such as Business Route 7/Main Street, Hirst Drive and Route 9. However the design and construction funds for this interchange have not been allocated to date. In addition, OTS staff believes that some of the recommended improvements listed as created by the background traffic are, in fact, also partially created by the proposed high school. These improvements include the recommended signal and east bound turn lane at the Business Route 7/Route 287 intersection, the traffic signal upgrade and turn lanes at Route 287/Hirst Drive, the east bound left turn lane on Business Route 7 (Main Street) onto 23<sup>rd</sup> Street, the signal and turn lanes at Business Route 7 (Main Street)/21<sup>st</sup> Street/20<sup>th</sup> Street/Route 690 intersection and turn lanes at the Business Route 7/ Hatcher Avenue intersection. In addition to those transportation improvements listed as warranted by the high school traffic, the applicant needs to partially fund these improvements based on the percentage of site traffic. Coordination is also needed between the Town of Purcellville, VDOT and Loudoun County to coordinate design and right-of-way issues including the proposed roundabout at the Route 690/Alder School Road intersection, right of way acquisition in the Town and County and funding. Further coordination and decisions are needed. The applicant notes that VDOT has not commented on the acceptability of the proposed round about but that VDOT did recommend a round about be considered at this location given the geometric and sight distance constraints and that preliminary design work is underway. The applicant notes that the need for the above improvements, in addition to those

committed to by the applicant, are already warranted by the background traffic volumes without the school traffic. The applicant notes that there is no rational nexus to assign the necessity of these improvements to the school. OTS staff disagrees and notes that while the needs for the various improvements is already demonstrated with background traffic, the additional school traffic will exacerbate the traffic and thus congestion and delay. Subsequent to the applicant's response letter, OTS has received an E mail in which the applicant indicates a willingness to provide pro rata cost shares for various improvements. In discussions with OTS staff, it was noted that, rather than contribute relatively small amounts of money each to many intersection improvement projects, the money would be better spent completing the top two needed projects. Based on the applicant's traffic study reflecting levels-of-service, the percentage of school traffic and safety considerations, OTS believes the applicant should agree to provide a south bound right turn lane on Route 287 onto Hirst Drive with appropriate signal modifications and a west bound right turn lane on Route 7/Main Street onto Hatcher Avenue. Also, in carrying out improvements to the Route 9/Route 690 intersection, the applicant's engineers need to consider the off set entrance to the Hillsboro Elementary School on the north side of the intersection and make it a four legged intersection. **The applicant is suggesting that the regional road contribution, approximately \$135,000, be placed towards the Route 9/Route 690 intersection for use towards a Roundabout. This assumes that a Round-about is agreed to and implemented at this location. If not, then the money should be allocated for use of road improvements in the vicinity of Purcellville which serve traffic accessing the school. Also, if the proposed Roundabout is not approved, the applicant would still need to provide the turn lanes and signal modifications at the Route 9/Route 690 intersection which was noted in the applicant's traffic study. Regarding the off set entrance, a Round-about at this location can be designed to allow full access for Route 690 and the school entrance. Provided the applicant is in agreement with the above, there is no outstanding issue.**

9. The applicant proposes to phase the various committed road improvements with some of the improvements proposed to occur after the school has opened. **The applicant proposes the following improvements prior to occupancy of the high school:**

- **A westbound left turn lane on Route 711 at the proposed high school entrance.**
- **An east bound right turn lane at Route 611 and Route 711.**
- **A Roundabout at the Route 690/Route 711 intersection.**
- **A contribution total of \$233,907 towards the Route 690/Route 9 Roundabout.**

**The applicant also proposes the following improvements within one year of occupancy:**

- **A south bound left turn lane and westbound right turn lane at the Hirst Drive/Hatcher Avenue intersection.**

- A southbound left turn lane and northbound right turn lane at the Hirst Drive/Maple Avenue intersection.

OTS is agreeable with the proposed phasing. This needs to be included specifically in the conditions of approval with this application. Also, as previously noted, the applicant will still be responsible for providing turn lane improvements and signal modification to the Route 9/Route 690 intersection in the event the Roundabout is not implemented at this intersection. If this is the case, the \$135,000 regional road contribution would be allocated for use of road improvements in the vicinity of Purcellville.

### **Recommendation**

Provided the applicant is in agreement with the OTS responses discussed in Comments 8 and 9, OTS would not object to the approval of this application.

D Drive/C files, Western Loudoun High School/Spex2006-0022.doc/Third submission

County of Loudoun

Office of Transportation Services

MEMORANDUM

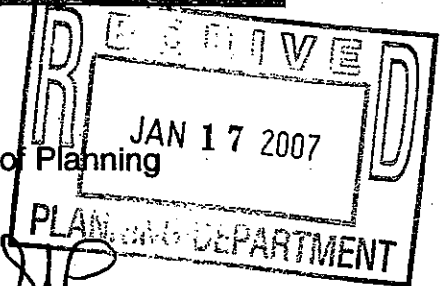
**DATE:** January 16, 2007

**TO:** Rodion Iwanczuk, Project Manager, Department of Planning

**THRU:** Art Smith, Senior Coordinator *AS*

**FROM:** George Phillips, Senior Transportation Planner *GP*

**SUBJECT:** SPEX 2006-0022, Western High School at Fields Farm  
Second Referral



**Location:** Southside of Route 711 between Route 690 and Route 611 north of Purcellville

**Background**

In response to initial OTS comments dated September 4, 2006, the applicant, the Loudoun County School Board, has provided a response letter dated December 12, 2006 and a revised special exception plat dated December 12, 2006 by the Timmons Group. Discussed below are the original OTS comments, the applicant's Response and whether the issue has been adequately addressed.

**Transportation Comments**

1. In order to minimize the impact of site traffic turning into/from the proposed entrances on through traffic on Routes 711 and Route 690, the applicant needs to provide right and left turn lanes which meet VDOT standards. Additional right of way may be required. The location of the proposed Route 690 entrance is awkward with respect to the alternative ramp configurations north of Route 7 needs to be taken into consideration. VDOT standards for intersection spacing and the potential for weave/merge issues specifically need to be addressed. The entrance shown on Route 690 may need to be removed or relocated further west. Additional land may also be needed for future interchange designs for Route 7 Bypass/Route 690. **The applicant notes that left and right turn lanes**

will be provided at the school's entrance and has already submitted initial design plans for these and other area improvements. The applicant notes that these may require additional right of way. The applicant also notes that access to Route 690 will be for emergency access only and that it will not be open to the general public for daily use by school related traffic. Provided the applicant is able to secure the necessary right of way and easements for the turn lanes, these issues have been adequately addressed.

2. Several interchange designs are being considered for Route 7 Bypass/Route 690. While a final design has not yet been reviewed and approved by VDOT, the applicant should agree to provide all necessary right of way as needed and accommodate an entrance relocation if needed. At a minimum, the various ramp configurations identified to date must be accommodated. As previously noted, the final interchange design may require changes to the site plan on the south side. **The applicant notes that, to date, the County does not yet have a preferred alternative. More importantly, the applicant notes that the proposed special exception being considered does not extend into the land area that might be needed for the Route 7/Route 690 interchange and that this land is already owned by the County. Issue adequately addressed.**
3. Will the proposed High School site access Route 690 through the Fields property? Please clarify. **The applicant notes that this will be for emergency access only and will not be open to school related traffic. All school traffic will access the site via Route 711 to the north. This Issue has been adequately addressed.**
4. Due to narrow widths in some areas, the typical sections on Route 711 and Route 690 may need to be improved to accommodate the anticipated site traffic and meet VDOT standards. **The applicant notes that the only area of concern identified for the Mountain View Elementary School traffic study and the traffic study completed for this application was the Route 711/Route 690 intersection. OTS acknowledges the applicant's response and agrees that this intersection is noted in the previous traffic studies. However, OTS recommends that VDOT engineering staff weigh in on this potential issue.**
5. There is currently no sidewalk or trail on these portions of Route 711 or Route 690. The applicant should provide 8-10' wide multi-purpose trails along the site frontage of Route 711 and Route 690. In addition, the applicant needs to coordinate pedestrian /bicycle trail access with the Town of Purcellville to the south to facilitate pedestrian access between the Town and this site. **The applicant has revised the plat to show a pedestrian circulation plan on site which adequately addresses the above issue.**



6. In order to accommodate the planned Purcellville Route 7 North Collector Road in the vicinity, the applicant shows dedication of 70 feet of right of way within the southern portion of the property. This is a desirable feature which should be maintained. **The applicant notes that the Fields Farm is owned by the Loudoun Board of Supervisors and that they have reflected the planned Purcellville North Collector Road and have kept the proposed uses from encroaching near the right of way. No outstanding issue.**
7. The traffic study does not assign any site traffic to two unpaved road segments in the vicinity of the proposed school. These are Route 711 between Route 611 and Route 287 and Route 611 between Route 9 and Route 711. OTS understands that the school will have control over the bus routes to and from the site, however, how will the school prevent or discourage students driving their automobiles over these road segments? Please clarify. **The applicant notes that there are a large number of unpaved roads in Loudoun County and that the CTP recognizes unpaved roads as having a natural traffic calming effect. In addition, the applicant notes that safe, paved roads have been identified to access the proposed school site and that these roads can adequately serve the proposed use. The choices drivers will utilize to reach the school will be made by the drivers and Loudoun County Schools cannot dictate route choice for automobile drivers. OTS acknowledges the applicants response. OTS would simply encourage the school to inform student drivers of the best routes to use and which to avoid such as Route 711 between Route 287 and Route 611. In addition, the school should insure that school bus routes not utilize this section of Route 711 between Route 287 and Route 611 unless picking up or dropping off students who live on this section of Route 711.**
8. On page 17 (Table 4) of the traffic study, a series of recommended transportation related improvements are listed for the proposed high school. The traffic study divides the recommended improvements into those warranted directly by the proposed high school and those warranted by existing/other background traffic growth. These are as follows:

#### Background Traffic

- Traffic signals at the Business Route 7 and the Harmony Middle School, Route 287 and 21<sup>st</sup> Street/20<sup>th</sup> Street/Route 690 intersections and the Route 287/Hirst Drive intersection. In addition, turn lanes are recommended at the Business Route 7/Route 287, Route 287/Hirst Drive, Hirst Drive/Maple Avenue, Hirst Drive/Route 690, and Main Street and 32<sup>nd</sup> Street, 23<sup>rd</sup> Street, 21<sup>st</sup>/20<sup>th</sup>Street/Route 690 and Hatcher Avenue intersections.

### High School Traffic

- Turn lanes at the Hirst Drive/Hatcher Avenue intersection, the Route 690/Route 9 intersection and Alder School Road (Route 711)/proposed site access. In addition, the traffic study notes that a 100' roundabout is needed at the Route 690/Alder School Road intersection.

VDOT needs to comment on the proposed round about at the Route 711/Route 690 intersection as compared with a possible future signal with turn lanes. The round about will require additional right of way to be obtained. These options also need to be weighed in light of the sight distance problems at this intersection.

Please note that a future interchange (beyond the proposed 2008 opening of the high school) at the Route 7 Bypass/Route 690 crossing would help to divert some traffic from parallel facilities such as Business Route 7/Main Street, Hirst Drive and Route 9. However the design and construction funds for this interchange have not been allocated to date. In addition, OTS staff believes that some of the recommended improvements listed as created by the background traffic are, in fact, also partially created by the proposed high school. These improvements include the recommended signal and east bound turn lane at the Business Route 7/Route 287 intersection, the traffic signal upgrade and turn lanes at Route 287/Hirst Drive, the east bound left turn lane on Business Route 7 (Main Street) onto 23<sup>rd</sup> Street, the signal and turn lanes at Business Route 7 (Main Street)/21<sup>st</sup> Street/20<sup>th</sup> Street/Route 690 intersection and turn lanes at the Business Route 7/ Hatcher Avenue intersection. In addition to those transportation improvements listed as warranted by the high school traffic, the applicant needs to partially fund these improvements based on the percentage of site traffic. Coordination is also needed between the Town of Purcellville, VDOT and Loudoun County to coordinate design and right-of-way issues including the proposed roundabout at the Route 690/Alder School Road intersection, right of way acquisition in the Town and County and funding. Further coordination and decisions are needed. **The applicant notes that VDOT has not commented on the acceptability of the proposed round about but that VDOT did recommend a round about be considered at this location given the geometric and sight distance constraints and that preliminary design work is underway. The applicant notes that the need for the above improvements, in addition to those committed to by the applicant, are already warranted by the background traffic volumes without the school traffic. The applicant notes that there is no rational nexus to assign the necessity of these improvements to the school. OTS staff disagrees and notes that while the needs for the various improvements is already demonstrated with background traffic, the additional school traffic will exacerbate the traffic and thus congestion and delay.** Subsequent to the applicant's response letter, OTS has received an E mail in which the applicant indicates a willingness to provide pro rata cost shares for various improvements. In discussions with OTS staff, it was noted that, rather than contribute relatively small amounts of money each to many intersection

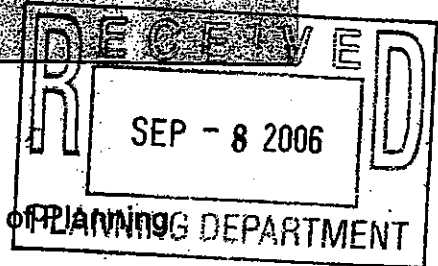
improvement projects, the money would be better spent completing the top two needed projects. Based on the applicant's traffic study reflecting levels-of-service, the percentage of school traffic and safety considerations, OTS believes the applicant should agree to provide a south bound right turn lane on Route 287 onto Hirst Drive with appropriate signal modifications and a west bound right turn lane on Route 7/Main Street onto Hatcher Avenue. Also, in carrying out improvements to the Route 9/Route 690 intersection, the applicant's engineers need to consider the off set entrance to the Hillsboro Elementary School on the north side of the intersection and make it a four legged intersection.

### **Recommendation**

OTS will have a recommendation once we have reviewed the responses to our second submission comments and met with the applicant and appropriate agencies.

D Drive/C files, Western Loudoun High School/Spex2006-0022.doc/Second submission

**County of Loudoun**  
**Office of Transportation Services**  
**MEMORANDUM**



**DATE:** September 4, 2006  
**TO:** Rodion Iwanczuk, Project Manager, Department of Planning  
**THRU:** Art Smith, Senior Coordinator  
**FROM:** George Phillips, Senior Transportation Planner  
**SUBJECT:** SPEX 2006-0022, Western High School at Fields Farm

**Location:** Southside of Route 711 between Route 690 and Route 611 north of Purcellville (See Attachment 1)

### **Background**

The applicant, the Loudoun County School Board, is seeking approval of a special exception to allow a 1600 student public high school and facilities in the JLMA-3 Zoning District north of Purcellville. It is currently zoned JLMA-3 (Joint Land Management Area). The applicant has submitted a traffic study dated May 30, 2006 by the Timmons Group and a special exception plat dated August 3, 2006 by the Timmons Group.

### **Existing & Proposed Road Network**

The proposed site is located on Route 711 and Route 690. Route 711 is a paved rural road approximately 20 feet wide. It includes a posted speed limit of 35 mph and currently serves the existing Mountain View Elementary School. This road is paved between Route 690 and Route 611 but is unpaved between Route 611 and Route 287. Based on the latest available (2004) VDOT traffic counts, this road segment carries 390 annual average daily vehicle trips. It is not included in the Countywide Transportation Plan (CTP) or VDOT Secondary Road Program (SRP) for improvement. The proposed high school would share an existing entrance onto Route 711 with the existing Mountain View Elementary School. There is a sight distance problem at the Route 711/Route 690 intersection west of the site looking south on Route 690 from Route 711. This is due to the location of a residence at the south-east quadrant of this intersection and the vertical/horizontal curvature of Route

690 in the vicinity of Alder School Road. Route 690 is a paved rural road approximately 19-20 feet wide in the vicinity of the site with no shoulders. It includes a large "S" curve that directs traffic east-west before curving back north-south. It has a posted speed limit of 45 MPH in the immediate area of the site. This is awkward with respect to sight distance and future engineering of the interchange. Based on the latest available (2004) VDOT traffic count data, this segment of Route 690 carries 3,100 daily vehicle trips in the vicinity of the site. The CTP calls for this portion of Route 690 to be a two lane local access undivided major collector within 50 feet of right-of-way with 10-11 foot wide lanes, 2 to 4 foot wide shoulders and a grade separated interchange at the Route 7 Bypass. There are currently no VDOT projects included in the Secondary Road program to improve this segment of Route 690. The Office of Transportation Services has completed a feasibility study of this interchange. No formal action was taken by the Town of Purcellville, the County or VDOT on any proposed designs. There is no funding currently available for design or construction of this interchange.

The planned Purcellville Route 7 North Collector Road, a four lane undivided road within 70 feet of right-of-way with 12 foot travel lanes and a 40-mph design speed, is shown to run between Route 287 and Route 690 with a segment appearing to cross the northern edge of the proposed site. This road has not been specifically designed.

### **Trip Generation Information**

Based on information from the Transportation Engineer's (ITE's) 7<sup>th</sup> Edition Trip Generation Manual, the proposed 1600 student high school is estimated to Generate 656 a.m. peak hour, 448 p.m. peak hour and 2,736 weekday vehicle trips.

### **Transportation Comments**

1. In order to minimize the impact of site traffic turning into/from the proposed entrances on through traffic on Routes 711 and Route 690, the applicant needs to provide right and left turn lanes which meet VDOT standards. Additional right of way may be required. The location of the proposed Route 690 entrance is awkward with respect to the alternative ramp configurations north of Route 7 needs to be taken into consideration. VDOT standards for intersection spacing and the potential for weave/merge issues specifically need to be addressed. The entrance shown on Route 690 may need to be removed or relocated further west. Additional land may also be needed for future interchange designs for Route 7 Bypass/Route 690.
2. Several interchange designs are being considered for Route 7 Bypass/Route 690. While a final design has not yet been reviewed and approved by VDOT, the applicant should agree to provide all necessary right of way as needed and

accommodate an entrance relocation if needed. At a minimum, the various ramp configurations identified to date must be accommodated. As previously noted, the final interchange design may require changes to the site plan on the south side.

3. Will the proposed High School site access Route 690 through the Fields property? Please clarify.
4. Due to narrow widths in some areas, the typical sections on Route 711 and Route 690 may need to be improved to accommodate the anticipated site traffic and meet VDOT standards.
5. There is currently no sidewalk or trail on these portions of Route 711 or Route 690. The applicant should provide 8-10' wide multi-purpose trails along the site frontage of Route 711 and Route 690. In addition, the applicant needs to coordinate pedestrian /bicycle trail access with the Town of Purcellville to the south to facilitate pedestrian access between the Town and this site.
6. In order to accommodate the planned Purcellville Route 7 North Collector Road in the vicinity, the applicant shows dedication of 70 feet of right of way within the southern portion of the property. This is a desirable feature which should be maintained.
7. The traffic study does not assign any site traffic to two unpaved road segments in the vicinity of the proposed school. These are Route 711 between Route 611 and Route 287 and Route 611 between Route 9 and Route 711. OTS understands that the school will have control over the bus routes to and from the site, however, how will the school prevent or discourage students driving their automobiles over these road segments? Please clarify.
8. On page 17 (Table 4) of the traffic study, a series of recommended transportation related improvements are listed for the proposed high school. The traffic study divides the recommended improvements into those warranted directly by the proposed high school and those warranted by existing/other background traffic growth. These are as follows:

#### Background Traffic

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### High School Traffic

- Turn lanes at the Hirst Drive/Hatcher Avenue intersection, the Route 690/Route 9 intersection and Alder School Road (Route 711)/proposed site access. In addition, the traffic study notes that a 100' roundabout is needed at the Route 690/Alder School Road intersection.

VDOT needs to comment on the proposed round about at the Route 711/Route 690 intersection as compared with a possible future signal with turn lanes. The round about will require additional right of way to be obtained. These options also need to be weighed in light of the sight distance problems at this intersection.

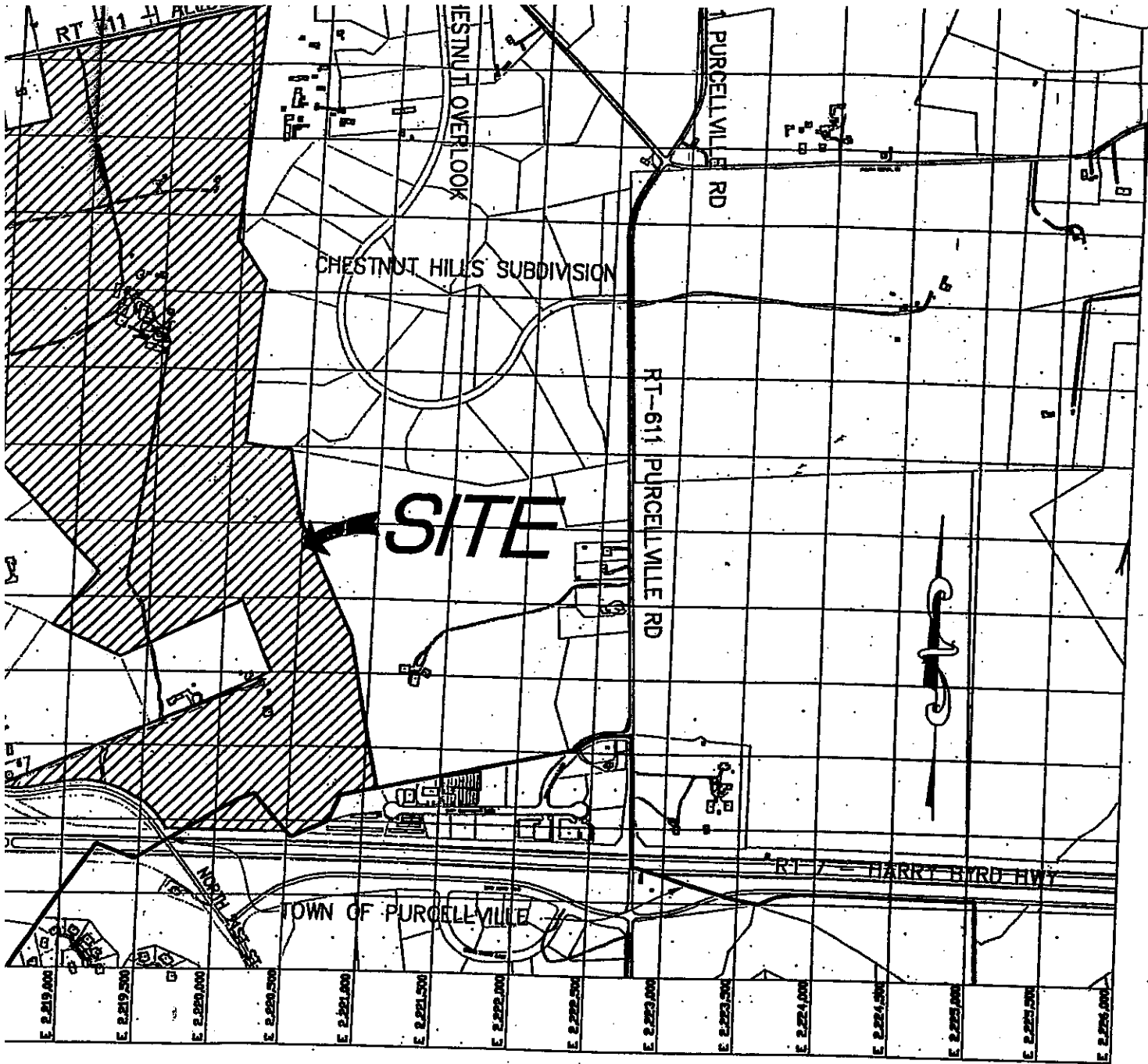
Please note that a future interchange (beyond the proposed 2008 opening of the high school) at the Route 7 Bypass/Route 690 crossing would help to divert some traffic from parallel facilities such as Business Route 7/Main Street, Hirst Drive and Route 9. However the design and construction funds for this interchange have not been allocated to date. In addition, OTS staff believes that some of the recommended improvements listed as created by the background traffic are, in fact, also partially created by the proposed high school. These improvements include the recommended signal and east bound turn lane at the Business Route 7/Route 287 intersection, the traffic signal upgrade and turn lanes at Route 287/Hirst Drive, the east bound left turn lane on Business Route 7 (Main Street) onto 23<sup>rd</sup> Street, the signal and turn lanes at Business Route 7 (Main Street)/21<sup>st</sup> Street/20<sup>th</sup> Street/Route 690 intersection and turn lanes at the Business Route 7/ Hatcher Avenue intersection. In addition to those transportation improvements listed as warranted by the high school traffic, the applicant needs to partially fund these improvements based on the percentage of site traffic. Coordination is also needed between the Town of Purcellville, VDOT and Loudoun County to coordinate design and right-of-way issues including the proposed roundabout at the Route 690/Alder School Road intersection, right of way acquisition in the Town and County and funding. Further coordination and decisions are needed.

### **Recommendation**

OTS will have a recommendation once we have reviewed the responses to our comments and met with the applicant and appropriate agencies.

C Drive, Western Loudoun High School/Spex2006-0022.doc





VICINITY MAP  
SCALE: 1" = 1000'

ENGINEER  
TIMMONS CROTT  
A-64  
REVISORS



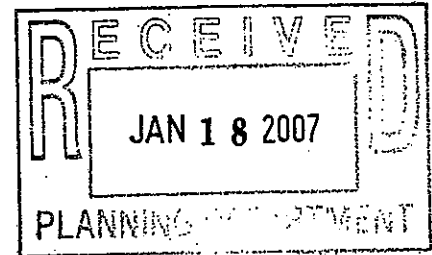
# COMMONWEALTH of VIRGINIA

DAVID S. EKERN, P.E.  
COMMISSIONER

## DEPARTMENT OF TRANSPORTATION

14685 Avion Parkway  
Chantilly, VA 20151  
(703) 383-VDOT (8368)

January 9, 2007



Rodion Iwanczuk  
County of Loudoun  
Department of Planning  
1 Harrison Street, S.E.  
P.O. Box 7000  
Leesburg, Virginia 20177-7000

Re: Western High School at Fields Farm  
Loudoun County Application Number SPEX 2006-0022

Dear Mr. Iwanczuk:

We have reviewed the above noted application as requested in your December 13, 2006 transmittal, and we have no objection to the approval of this application subject to the following comment.

1. This office will provide comments relating to roadway and entrance improvements for the high school on the construction plan application (STPL2006-0081).

If you have any questions, please call me at (703) 383-2041.

Sincerely,

Thomas B. Walker  
Senior Transportation Engineer

ATTACHMENT 1 F.

A-65



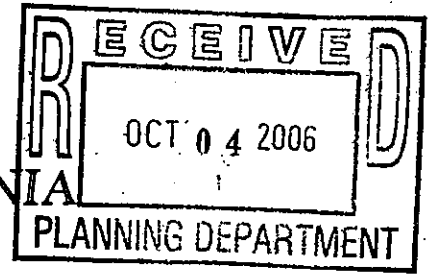
# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF TRANSPORTATION

14685 Avion Parkway  
Chantilly, VA 20151  
(703) 383-VDOT (8368)

September 28, 2006

DAVID S. EKERN, P.E.  
COMMISSIONER



Rodion Iwanczuk  
County of Loudoun  
Department of Planning  
1 Harrison Street, S.E.  
P.O. Box 7000  
Leesburg, Virginia 20177-7000

Re: Western High School at Fields Farm  
Loudoun County Plan Number SPEX 2006-0022

Dear Mr. Iwanczuk:

We have reviewed the above referenced application and offer the following comments.

1. This office supports the recommended improvements on Page 20 of the Traffic Impact Analysis dated May 30, 2006. Prior to considering a roundabout for the Route 690/Alder School Road intersection, the availability of right of way should be evaluated.
2. Additional comments specific to the re-timing of signals as suggested in the Analysis will be forthcoming from our Traffic Engineering Section.

If you have any questions, please call me at (703) 383-2041.

Sincerely,

Thomas B. Walker  
Senior Transportation Engineer



# Loudoun County Health Department

P.O. Box 7000  
Leesburg VA 20177-7000



Environmental Health  
Phone: 703 / 777-0234  
Fax: 703 / 771-5023

Community Health  
Phone: 703 / 777-0236  
Fax: 703 / 771-5393

February 16, 2007

**MEMORANDUM TO:** Rodion Iwanczuk, Project Manager MSC 62  
Department of Planning

**FROM:** Joseph E. Lock *JEL* MSC 68  
Rural Section Supervisor  
Division Of Environmental Health

**SUBJECT:** SPEX 2006-0022, Western High School at Fields Farm  
LCTM 35/21-1, 35/21-2, PIN 2184904810

The above referenced project meets the requirements of Section 1245.10 of the LSDO for:

	Yes	No	N/A
a. Proposed Drainfield Sites	<u>X</u>	_____	_____
b. Proposed Wells	<u>X</u>	_____	_____

The locations on the plat, submitted by Timmons Group revised February 12, 2007, are correct as shown:

a. Wells (existing and proposed)	<u>X</u>	_____	_____
b. Drainfield Sites	<u>X</u>	_____	_____

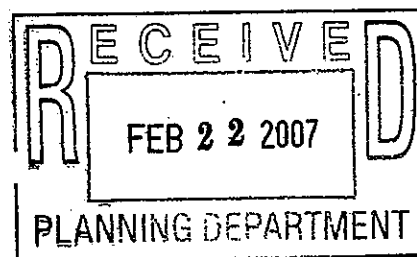
Health Department staff recommends: Approval \_\_\_\_\_ Denial \_\_\_\_\_  
Approval with conditions X

Items that are incorrect/deficient are listed on the attached page.

Attachments Yes X No \_\_\_\_\_

If further information or clarification on the above project is required, please contact me at (703)771-5800.

JEL/JDF/jel *JEL*  
C:WesternHighSchoolFieldsFarm3.Referral



ATTACHMENT 19.

A67

**SPEX 2006-0022**  
**LCTM 35/21-1, 35/21-2**  
**February 16, 2007**  
**Page 2**

### **ATTACHMENT**

The septic design has been received for the school and has been reviewed by the State and County. This office will request additional information for the design, and it will be necessary prior to the septic permit being issued.

A well has been constructed for the proposed school and the preliminary hydrogeological study has been completed.



# Loudoun County Health Department

P.O. Box 7000  
Leesburg VA 20177-7000



Environmental Health  
Phone: 703 / 777-0234  
Fax: 703 / 771-5023

Community Health  
Phone: 703 / 777-0236  
Fax: 703 / 771-5393

December 27, 2006

**MEMORANDUM TO:** Ridion Iwanczuk, Project Manager MSC 62  
Department of Planning

**FROM:** Joseph E. Lock *JE* MSC 68  
Rural Section Supervisor  
Division Of Environmental Health

**SUBJECT:** SPEX 2006-0022, Western High School at Fields Farm  
LCTM 35/21-1, 35/21-2, PIN 2184904810

The above referenced project meets the requirements of Section 1245.10 of the LSDO for:

	Yes	No	N/A
a. Proposed Drainfield Sites	_____	<u>X*</u>	_____
b. Proposed Wells	_____	<u>X</u>	_____

The locations on the plat, submitted by Timmons Group revised December 12, 2006, are correct as shown:

a. Wells (existing and proposed)	_____	<u>X</u>	_____
b. Drainfield Sites	_____	<u>X*</u>	_____

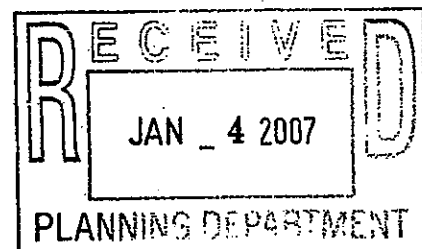
Health Department staff recommends: Approval \_\_\_\_\_ Denial X  
Approval with conditions \_\_\_\_\_

Items that are incorrect/deficient are listed on the attached page.

Attachments Yes X No \_\_\_\_\_

If further information or clarification on the above project is required, please contact me at (703)771-5800.

JEL/JDF/jel *QPS*  
C:WesternHighSchoolFieldsFarm2.Referral



*A-69*

**SPEX 2006-0022**  
**LCTM 35/21-1, 35/21-2**  
**December 27, 2006**  
**Page 2**

### **ATTACHMENT**

The septic design has been received for the school and is currently under review by the State and County. This office will request additional information for the design, and therefore this Department cannot comment on the proposed special exception or the actual or proposed usage.

No abandonment permits have been filed for the existing septic and wells.

A well has been constructed for the proposed school, however, the detailed hydrogeological study has not been completed. This well must be shown on the plat.

\*On Sheet C2.0 and C3.0, the drainfield shown as "ULYFL PRIMARY AND RESERVE" is incorrect. This is NOT designated for the Upper Loudoun Youth Football League. They have been approved for Permanent Pump and Haul by the Loudoun County Board of Supervisors. This must be ~~delineated~~ from the plat.





# Loudoun County Health Department

P.O. Box 7000  
Leesburg VA 20177-7000



Environmental Health  
Phone: 703 / 777-0234  
Fax: 703 / 771-5023

Community Health  
Phone: 703 / 777-0236  
Fax: 703 / 771-5393

August 29, 2006

**MEMORANDUM TO:**

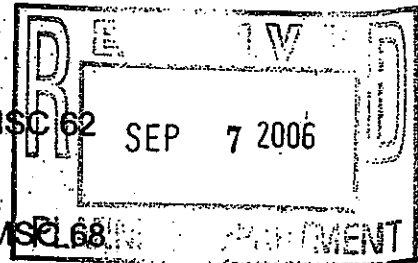
Ridion Iwanczuk, Project Manager  
Department of Planning

**FROM:**

Joseph E. Lock  
Rural Section Supervisor  
Division Of Environmental Health

**SUBJECT:**

SPEX 2006-0022, Western High School at Fields Farm  
LCTM 35/21-1, 35/21-2, PIN 2184904810



The above referenced project meets the requirements of Section 1245.10 of the LSDO for:

	Yes	No	N/A
a. Proposed Drainfield Sites	_____	<u>X</u>	_____
b. Proposed Wells	_____	<u>X</u>	_____

The locations on the plat, submitted by Timmons Group dated June 20, 2006, are correct as shown:

a. Wells (existing and proposed)	<u>X</u>	_____	_____
b. Drainfield Sites	_____	<u>X</u>	_____

Health Department staff recommends: Approval \_\_\_\_\_ Denial X  
Approval with conditions \_\_\_\_\_

Items that are incorrect/deficient are listed on the attached page.

Attachments Yes X No \_\_\_\_\_

If further information or clarification on the above project is required, please contact me at (703)771-5800.

JEL/JDF/jel *JDF*  
C:WesternHighSchoolFieldsFarm.Referral

**SPEX 2006-0022**  
**LCTM 35/21-1, 35/21-2**  
**August 29, 2006**  
**Page 2**

### **ATTACHMENT**

No septic design has been received for the school or the proposed uses. This office cannot comment on the proposed special exception or the actual or proposed usage. No proposal from an engineering firm has been received for formal comments or scheduling a preliminary engineering conference.

No abandonment permits have been filed for the existing septic and wells.

No proposed well site has been proposed for school. This must be done through the County and State Departments. No proposed use can be within 100' of any of the existing wells for the schools.

L. Preston Bryant, Jr.  
Secretary of Natural  
Resources



Joseph H. Maroon  
Director

**COMMONWEALTH of VIRGINIA**  
**DEPARTMENT OF CONSERVATION AND RECREATION**

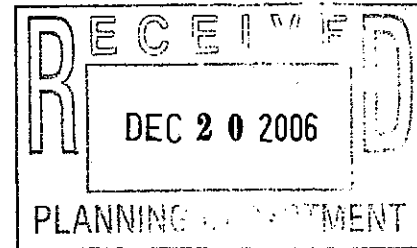
217 Governor Street  
Richmond, Virginia 23219-2010  
(804) 786-7951 FAX (804) 371-2674

December 18, 2006

Rodion Iwanczuk  
Department of Planning, County of Loudoun  
1 Harrison Street, 3<sup>rd</sup> Floor  
Leesburg, VA 20177-7000

Re: SPEX 2006-0022, Western High School at Field Farms

Dear Mr. Iwanczuk:



The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

Biotics historically documents the presence of natural heritage resources in the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

In addition, our files do not indicate the presence of any State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

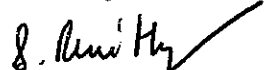
Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Virginia Department of Conservation and Recreation (DCR), DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

New and updated information is continually added to Biotics. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

The Virginia Department of Game and Inland Fisheries maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters, that may contain information not documented in this letter. Their database may be accessed from [www.dgif.virginia.gov/wildlife/info\\_map/index.html](http://www.dgif.virginia.gov/wildlife/info_map/index.html), or contact Shirl Dressler at 804-367-6913.

Should you have any questions or concerns, feel free to contact me at 804-371-2708. Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Rene' Hypes", with a long, sweeping horizontal stroke extending to the right.

S. Rene' Hypes

Project Review Coordinator

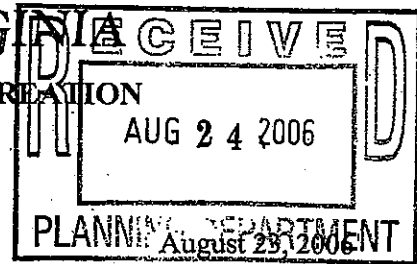
L. Preston Bryant, Jr.  
Secretary of Natural Resources



Joseph H. Maroon  
Director

**COMMONWEALTH of VIRGINIA**  
**DEPARTMENT OF CONSERVATION AND RECREATION**

217 Governor Street  
Richmond, Virginia 23219-2010  
(804) 786-7951 FAX (804) 371-2674



Rodion Iwanczuk  
Loudoun County  
Department of Planning  
1 Harrison St. SE, 3<sup>rd</sup> Floor  
Leesburg, VA 20177-7000

Re: SPEX 2006-0022: Western High School at Fields Farm

Dear Mr. Iwanczuk:

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

Biotics historically documents the presence of natural heritage resources in the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

Our files also do not indicate the presence of any State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Virginia Department of Conservation and Recreation (DCR), DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

Any absence of data may indicate that the project area has not been surveyed, rather than confirm that the area lacks additional natural heritage resources. New and updated information is continually added to Biotics. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

The Virginia Department of Game and Inland Fisheries maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters, that may contain information not documented in this letter. Their database may be accessed from [http://www.dgif.virginia.gov/wildlife/info\\_map/index.html](http://www.dgif.virginia.gov/wildlife/info_map/index.html), or contact Shirl Dressler at (804) 367-6913.

Should you have any questions or concerns, feel free to contact me at 804-371-2708. Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "S. René Hypes", with a long, sweeping horizontal line extending to the right.

S. René Hypes  
Project Review Coordinator

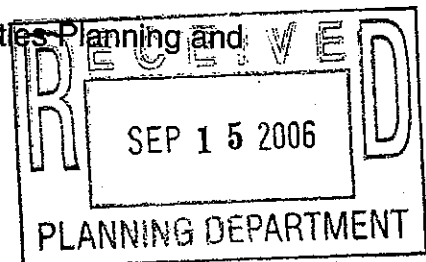


**COUNTY OF LOUDOUN  
PARKS, RECREATION AND COMMUNITY SERVICES  
REFERRAL MEMORANDUM**

**To:** Rodion Iwanczuk, Project Manager  
Department of Planning

**From:** Mark A. Novak, ASLA, Chief Park Planner, Facilities Planning and Development

**CC:** Diane Ryburn, Director  
Steve Torpy, Assistant Director  
Su Webb, Park Board, Chairman  
Stephenie Doyle, Park Board, Blue Ridge District



**Date:** September 15, 2006

**Subject:** SPEX 2006-0022 Western High School at Fields Farm

**Election District:** Blue Ridge **Sub Planning Area:** Route 7 West

**MCPI #** 522-29-5928-001, 522-29-5928-002

**BACKGROUND:**

Loudoun County Public School (LCPS) is seeking a special exception to allow a high school on the Fields Farm Property located on Route 711 (Alder School Road), north of Purcellville and the Route 7 Bypass, between Route 690 (Hillsboro Road) and Route 611 (Purcellville Road). The Field Farms Property consist of 230.57 acres, and is primarily zoned JLMA -3 (Joint Land Management Area, 1 dwelling unit per 3 acres) and M-1 (Limited Industrial). The proposed high school is to be located on approximately 145.75 acres within the JMLA-3 District. School use is permitted in the JLMA-3 District subject to approval of a special exception.

The Field Farm Property is owned by the Loudoun County Board of Supervisors and is located in the joint Land Management Area (JLMA or Urban Growth Area) of the Town of Purcellville. Mountain View Elementary School is located in the northwest portion of the Fields Farm Property. A Special Exception (SPEX 2004-0009) has been approved to construct the Upper Loudoun Youth Football League Recreational Facilities on the Southern portion of the property. The High School is proposed to be located on the remaining portion of the land. The high school will be approximately 260,000 square feet in size with a capacity design of 1600 students. The additional facilities associated with the high school include a football stadium, concession stands, ticket booths, storage buildings, field house, baseball dugout and various athletic fields. The desired opening is for the fall of 2008.

ATTACHMENT 1 i.

A-27

**COMMENTS:**

With respect to Parks, Recreation and Community Services (PRCS) we offer the following comments and recommendations:

1. The Department of Parks, Recreation and Community Services has enjoyed a long-standing collaboration with Loudoun County Public Schools that allows the use of certain school facilities for PRCS programs. We appreciate that cooperative agreement and hope it continues since it is clearly consistent with the Revised General Plan policy that states school sites should be "*community assets and the focal point for active recreation and after-school programs*".

**CONCLUSION/RECOMMENDATION:**

PRCS would not be in objection to a favorable recommendation for approval on this application.

Please contact if I can be of further assistance. I'm available and look forward to attend any meetings or sessions to offer our support or to be notified of any further information regarding this project. I can be reached at 703-737-8992.





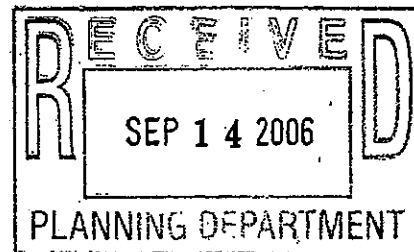
Loudoun County, Virginia  
Department of Fire, Rescue and Emergency Management

803 Sycolin Road, Suite 104 Leesburg, VA 20175  
Phone 703-777-0333 Fax 703-771-5359



## Memorandum

**To:** Rodion Iwanczuk, Project Manager  
**From:** Maria Figueroa Taylor, Fire-Rescue Planner  
**Date:** September 14, 2006  
**Subject:** Western High School at Fields Farm  
SPEX 2006-0022



Thank you for the opportunity to review the above captioned application to allow a public school and associated facilities in the JLMA – 3 Zoning District.

The Fire-Rescue GIS and Mapping coordinator offered the following information regarding estimated response times:

PIN	Project name	Purcellville VF-RC Miles	Purcellville VF-RC Travel Time
522-29-5928	Western High School	Fire, St # 2 -- 2.92 Rescue, St # 14 -- 2.57	5 minutes, 50 seconds 5 minutes, 8 seconds

Travel Times for each project were calculated using ArcView and the Network Analyst extension to calculate the distance in miles. This distance was then doubled to provide an approximate travel time for a Fire or EMS unit to reach each project site. To get the total response time another two minutes were added to account for dispatching and turnout. This assumes that the station is staffed at the time of the call. If the station is unoccupied, another one to three minutes should be added.

Project name	Approximate Response Time for Purcellville VF-RC
Western High School	7 minutes, 50 seconds 7 minutes, 8 seconds

The Fire-Rescue Planning Staff did not receive comments from the first due fire-rescue company by the requested due date.

The plans show two possible emergency only access points to the school property with a chain and bollard barricade. We respectfully request that the applicant would consider a different method to limit the use of the emergency driveway. Staff is available to provide

Teamwork \* I:

ATTACHMENT 1j.

\* Service

A-79

some suggestions that will ensure timely response of emergency vehicles while maintaining the intent of emergency only use of the driveway. If you have any questions or need additional information, please contact me at 703-777-0333.

C: Project file

Teamwork \* Integrity \* Professionalism \* Service

11-80

**Rodion Iwanczuk - Re: Western HS comments**

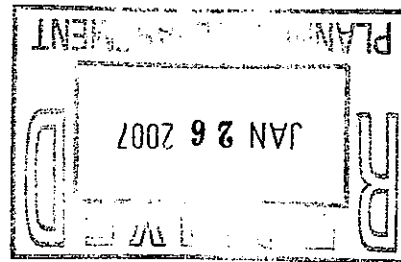
**From:** Maria Taylor  
**To:** Iwanczuk, Rodion  
**Date:** 1/29/2007 4:14 PM  
**Subject:** Re: Western HS comments

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Hello! Thank you for the opportunity to review the Applicant's response to our first referral. At this time we have no further comments or outstanding issues. Let me know if you have any questions. Thank you.

Maria

Maria Figueroa Taylor  
 Planner  
 Loudoun County Fire-Rescue and Emergency Management  
 803 Sycolin Road, Suite 104  
 Leesburg, VA 20175  
 703-777-0333  
 703-771-5359 (fax)



Teamwork, Integrity, Professionalism and Service

>>> Rodion Iwanczuk 1/19/2007 10:21 AM >>>  
 Hi all,

Some of you I've already spoken to about this, and others, just a friendly reminder that the 2nd Referral comments for Western HS SPEX 2006-0022 should be sent to me in the very near future (they were due on the 16th, 4 extra days since of course the 12th - the end of the 30-day review period - was a State and County holiday and didn't apply). So, probably sometime in the next week if possible (January 26). Any questions, problems, please of course give me a call, e-mail, etc. and we'll deal with it.

For your viewing pleasure, and possibly of assistance, the following link is to the LCPS PowerPoint presentation from Wednesday evening at the Community Information Meeting concerning the HS. A nice, concise summary of some of the project details, etc., in color!!

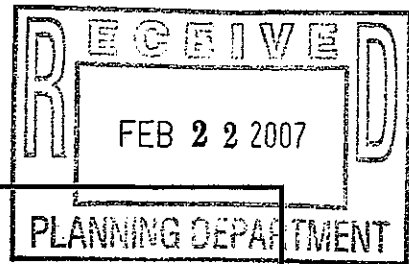
<http://cmsweb1.loudoun.k12.va.us/509905169119/lib/509905169119/HS-3 SPEX Jan 07Web.ppt>

Thanks all for your assistance and consideration.

Best,

Rodion Iwanczuk, Senior Planner  
 Community Information and Outreach  
 Loudoun County Dept. of Planning  
 1 Harrison Street, 3rd Floor, MS62  
 PO Box 7000  
 Leesburg, VA 20177-7000  
 Tel: (703) 777-0246 Fax: (703) 777-0441

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DEPARTMENT OF PLANNING & ZONING

MEMORANDUM

Date: February 22, 2007

To: Rodion Iwanczuk, Loudoun County Planning Project Manager

SUBJECT: SPEX-2006-0022 Western High School at Fields Farm

The Town of Purcellville ("Town"), Office of Planning & Zoning has reviewed the above-referenced application. The Town appreciates the opportunity to comment on the second and third submissions of the application. The Town's comments are as follows:

A. Commission Permit/PUGAMP Amendment

The Town of Purcellville maintains that either Commission Permits from the Purcellville and Loudoun County Planning Commissions or a PUGAMP amendment are/is necessary to locate a high school at the Fields Farm property. The Fields Farm property is located entirely within the Purcellville Urban Growth Area Management Plan (PUGAMP) planning area (now, the Joint Land Management Area, or "JLMA"). Thus, this property is subject to the policies contained in PUGAMP. This requirement is further supported by the County's Revised General Plan, which specifically states, on page 9-23, that development within the JLMA will comply with the PUGAMP. A high school is not shown for this site on Figure 10, the *Existing and Proposed School Locations* map on page 48 of the PUGAMP (See Attachment A). This is confirmed by the County Department of Planning's Second Referral Memorandum of February 1, 2007. On page 2 of that memorandum, the County Planning Staff acknowledges that there was a specific high school site shown on Figure 10 which cannot be utilized, due to by-right residential development of the property.

On May 24, 2006, the Purcellville Director of Planning and Zoning (the Director) determined that a high school is not a "feature shown" on or in the vicinity of Fields Farm within the PUGAMP plan and, therefore, in conformance with Virginia Code Section §15.2-2232, a Commission Permit is required to locate a high school on Fields Farm. The Director also believes that, since PUGAMP is a jointly adopted comprehensive plan, in accordance with the Town/County Annexation Agreement and Virginia Code Section 15.2-2231, both the Town and Loudoun County Planning Commissions must approve a commission permit for the high school at this location.

Virginia Code Section §15.2-2232 sets forth the State law regarding the legal status of a comprehensive plan and specifies that properly adopted comprehensive plans “shall control the general or approximate location, character, and extent of each feature shown on the plan” and further that, “unless a feature is already shown on the adopted master plan ...no building or public structure...shall be constructed, established or authorized, unless and until the general location or approximate location, character, and extent thereof has been submitted to and approved by the [planning] commission as being substantially in accord with the adopted comprehensive plan....” [emphasis added]. Note that the test for the commission permit review is not just whether or not a proposed public facility is a feature shown anywhere on a plan map, but that it is in the “general location or approximate location” shown on the map.

There are specific “preferred school sites” shown on Figure 10 for proposed elementary, middle and high schools (designated by an outline E, M and H, respectively). As noted above, the County Planning staff agrees that there was a “specific” high school site on Figure 10. The proposed Fields Farm high school site is on the northwestern edge of the PUGAMP area in a completely different quadrant than the Figure 10 designated high school site, which lies on the northeastern edge of the PUGAMP area east of Route 287. The entire width of the PUGAMP area on the north side of Route 7 is only 3 miles, and the Fields Farm property is located about two miles from the preferred high school site identified on Figure 10. This can hardly be considered the same “approximate location”. (See Attachment B).

The preferred high school site was not arbitrarily placed on Figure 10 when the plan was adopted in 1995. The high school site was located along the Rt. 287 corridor due to its convenient access to the grade-separated interchange with the Rt. 7 Bypass and its location within the largest land holding at the time within the PUGAMP area (the Wright Farm, which was under single ownership and included approximately 484 acres on both sides of Rt. 287). Since the School Board sometimes receives donated school sites as part of proffered rezonings, and Wright Farm is an area designated for possible higher residential zoning in PUGAMP, the high school site on Wright Farm could potentially have been donated through a rezoning application covering this site.

An elementary school is shown on Figure 10 approximately on Fields Farm. Thus, the Town did not object to the County’s location of Mountain View Elementary School on Fields Farm without a commission permit from either the Town or County Planning Commissions.

The related PUGAMP text also supports the necessity for a commission permit or PUGAMP amendment for the school at this location. The text on page 47 states that:

“The preferred location for new school sites is shown on Figure 10, p. 48. The Loudoun County School Board and School Administration staff will be requested to re-evaluate school needs and preferred locations following completion and

adoption of the Sewer and Water Master Plan and once a phasing proposal for the UGA is complete (see also Phasing Policy #3, p. 58)." [Emphasis added]

This text establishes that Figure 10 is the part of PUGAMP containing the location of proposed school sites and that specific "preferred locations" for the schools are depicted. It also indicates that there will be a process involved if these preferred school sites are to be changed after certain other studies are completed.

**The public facility location issue is not whether Fields Farm is an appropriate location for a high school, but rather that there is a process that must be followed prior to locating a high school there, because a high school is not a "feature shown" on or in the vicinity of the Fields Farm site.** The need for a specific process to change the preferred school locations is noted above and is further specified on page 58 in the Phasing portion of the PUGAMP Implementation Chapter (also referenced on PUGAMP page 48 cited above). This text, page 58, paragraph #3 states:

"The Town and the County will work jointly with the Loudoun County School Board and School Administration staff to re-evaluate school needs **and preferred locations for new schools** once the 10-year preferred development pattern is identified and ultimate densities are determined following completion of the Sewer and Water Master Plan." [Emphasis added]

**If the proposed school sites could be moved arbitrarily and unilaterally within the PUGAMP area by Loudoun County without Town approval or involvement, the joint Town/County re-evaluation process required on pages 48 and 58 of PUGAMP would be unnecessary.**

Although the referenced studies in paragraph #3 on page 58 have been completed since adoption of PUGAMP in 1995, the process of reevaluating these preferred school sites has never taken place. There are two ways that the proposed or preferred school sites shown on PUGAMP Figure 10 could be changed in accordance with the intent of PUGAMP policies regarding such a process, as stated on pages 48 and 58 cited above.

One way would be to amend the PUGAMP plan to change Figure 10 to show a high school on Fields Farm. This would require recommendations by both the County and Town Planning Commissions and approval by both the Town Council and the Board of Supervisors, in accordance with the Town/County Annexation Agreement, relevant State law and Town and County comprehensive plan amendment procedures.

A more expeditious way is usually the Commission Permit process, as suggested by the Town and as discussed at length above. As the County has acknowledged, PUGAMP is the governing comprehensive plan of both the Town of Purcellville and Loudoun County for the Fields Farm site. In the absence of a PUGAMP amendment, the Commission Permit process must be followed by the Town Planning Commission and, in the Town's opinion, the Loudoun County Planning Commission, and a Commission Permit must be

issued by both the Town and County Planning Commissions prior to authorization of a high school at Fields Farm.

In review comments on this application dated February 1, 2007, the Loudoun County Community Planning Staff has requested that the County Planning Commission make a finding as part of this application regarding conformity of the Fields Farm site with the comprehensive plan. Such a finding must be made through the process outlined in Virginia Code Section § 15.2-2232, which is the Commission Permit process. The Town is encouraged that the County Community Planning staff has acknowledged that such a finding is required, since the high school location shown on Figure 10 is not being used. However, the Town reiterates that as a result of the joint agreement in PUGAMP, an amendment to PUGAMP or commission permits from the two Planning Commissions must be accomplished, as outlined above. The Town also notes that Loudoun County Public Schools did not provide a written response to this recommendation in its "Response to Second Review Referral Comments" dated February 15, 2007. The Town requests such a response in writing.

**B. Proposed Utility Systems**

The Town of Purcellville continues to have concerns regarding the proposed water and wastewater systems for the high school, as summarized below.

1. Health Department approvals of the proposed drainfields: The Health Department memorandum dated February 16, 2007 recommends conditional approval of the project, stating that the Department "will request additional information for the design" of the proposed septic system prior to the septic permit being issued. The Town would like to know what additional information for the design is required by the Health Department and why this additional information is necessary.
2. Health Department approvals of the three proposed uses of the drainfields: The SPEX plat dated February 12, 2007 shows drainfield allocation to the high school of part of the drainfield area designated for Upper Loudoun Youth Football League (ULYFL) use in their approved SPEX. How can HS-3 use a drainfield area previously approved for use by ULYFL? These changes to the previously designated ULYFL drainfield area appear to require an amendment of the ULYFL SPEX.

In addition, Health Department stated in its second referral letter that ULYFL has permission for a permanent pump and haul. Pump & haul is an alternative system that is prohibited by PUGAMP. (see PUGAMP, page 45). The Town was not given the opportunity to comment on the Board of Supervisors' last minute approval of a pump and haul system. Given the temporary nature of pump and haul systems, a permit for a drainfield for ULYFL should be obtained as a condition of this application to ensure the availability of a drainfield for ULYFL.



2. Communal water and wastewater systems. The Town requests additional information on the assignment of wells for the high school and elementary school. The revised SPEX plat now show two wells, but does not indicate if they will both be used by both schools or if one is exclusively for the high school and one for the elementary school. Please clarify. Any sharing of facilities would constitute a communal system. Chapter Five, *Public Facilities and Utilities* (page 45) of the PUGAMP, states that:

“3. The use of communal, interim or alternative wastewater treatment systems and communal water supply systems will generally not be permitted in the UGA.” [Emphasis added]

PUGAMP does note an exception to this prohibition for communal systems serving rural hamlets; however, no such exception exists for any other uses.

3. Alternative Wastewater Treatment Systems. The proposed LCPS high school development in the Purcellville UGA/JLMA includes construction of an alternative wastewater system as defined under the Loudoun County Codified Ordinances. This type of system not only violates PUGAMP, as noted above, but also contradicts the provisions of the Revised General Plan. The November 1, 2006 Bury+Partner report submitted by LCPS to LCSA and the Health Department confirms that LCPS has proposed construction of an alternative wastewater system for a high school on the Fields Farm property. The proposed system includes aerobic treatment, a pump station, and drip irrigation components.

The County-specified manufacturer of the system identifies the proposed system as an alternative drainfield. The Loudoun County Department of Health FSN-4 Alternative Individual Onsite Systems also classifies the system as an alternative wastewater system stating:

“Alternative treatment is locally defined as anything different than a conventional septic tank and trenches supplied by gravity from a distribution box.”

The proposed system would also fall under the definition of an alternative wastewater system contained in Loudoun County Codified Ordinances, Chapter 1066, which specifies:

“...alternative onsite system means a wastewater treatment and dispersal system that includes different or additional components than typically used in a conventional system. This includes but is not limited to aerobic treatment units, media filters, low pressure or drip dispersal.”

In addition, Section 2-1207 of the Loudoun County Zoning Ordinance states:

"Both municipal water and municipal sewer facilities must be provided to every development site, if available as determined by the Town, except for Town-owned or County-owned and operated public uses that may use communal systems (except in areas bear (sic) Purcellville, which are subject to the existing annexation agreement between the County of Loudoun and the Town of Purcellville). If municipal water or municipal sewer facilities are not available, development may be served by private well or septic system, respectively." [Emphasis added]

An e-mail from Loudoun County Sanitation Authority (Todd Danielson) to Martha Mason Semmes dated January 17, 2007 states, "We are currently operating the wastewater facility for Mountain View Elementary School and have requested the wastewater facility for Fields Farm be co-located with the elementary school's facility." The e-mail asks whether this is permissible under PUGAMP. This would be considered a communal system which is not permitted by PUGAMP except for rural hamlets. The LCSA plan would contravene the LCPS statement that the water and wastewater facilities will be "separate and distinct."

The Town agrees with County Community Planning Staff comments that there needs to be assurance that the high school drainfields will not be shared with the elementary school or other facilities, because communal systems do not conform to the plan. If water and wastewater facilities for the proposed high school are to be separate and distinct from those serving Mountain View and ULYFL, please designate on the SPEX plat which uses each of the wells, sanitary facilities, and drainfield areas will be serving.

4. Request for Reports. Several reports are mentioned in the LCPS's response to the Health Department comments. The Town requests copies of the following:

- Comments of LCSA dated 10/4/06 re: wastewater and subsurface disposal systems;
- Preliminary engineering report dated 11/1/06 re: wastewater treatment system;
- Final engineering plans for wastewater (due to be filed in 1/07);
- Phase 1 & 2 Environmental Site Assessments by EarthTech dated 6/2000, 9/2000 and 7/24/06; and
- Results of the tests to determine impact of groundwater extraction on neighboring properties that were to be performed in December 2006 or January 2007.

C. Relationship to other County Planning Documents

The County Revised General Plan recognizes PUGAMP as a jointly adopted comprehensive plan that cannot be amended without joint consent. Specifically, the Revised General Plan directs the following with respect to the PUGAMP:

"The policies and guidelines in the Revised General Plan will supercede any conflicting policies and/or guidelines contained in any of the plans mentioned above with the exception of PUGAMP. The PUGAMP is unique because the Town and County jointly adopted it. The jointly adopted PUGAMP establishes detailed land use and growth management policies for the area surrounding the Town. As such, any policies or amendments must be reviewed and approved by both the Town and County." (page 1-2 of the Revised General Plan)

Chapter 1 (page 5) of PUGAMP, describes the relationship as follows:

"Typically, land immediately outside the corporate limits of a town is subject to policies and regulations in the County's comprehensive plan and zoning ordinance. The PUGAMP is unique because it is the first area plan developed and adopted jointly by a town and the County...Although the County's General Plan provides guidelines for land use in the Purcellville Urban Growth Area, these policies are superseded by the policies included in the PUGAMP. The PUGAMP will be implemented as an element of both the Town's and County's respective comprehensive plans." [Emphasis added]

**D. Transportation and Traffic Impact Analysis**

1. The Traffic Impact Analysis (TIA) is flawed and is inconsistent with both the Loudoun County Revised General Plan and the Purcellville Urban Growth Area Management Plan (PUGAMP).

- a. Background. As outlined in a May 30, 2006 report, the Timmons Group conducted a TIA for the Loudoun County Public Schools (LCPS) to evaluate traffic impacts for the proposed construction of an 1800-student high school on a portion of the Fields Farm property.

i. *2001 TIA for Fields Farm*

The TIA conducted for the Mountain View Elementary School development is dated October 2001. The rural areas of the County at that time were zoned one house per three acres (A-3). The study made the following assumptions:

- 2001 traffic counts were used to establish "background traffic";
- Traffic for the period 2003 through 2013 was projected to grow at 2%;
- At least 15% of the school traffic would use the unpaved portion of Alder School Road - Route 711 from the Berlin Turnpike - Route 287.

ii. *2006 TIA for Fields Farm*

The TIA conducted for the HS-3 development is dated May 2006. The rural areas of the County are zoned at either one house per twenty or forty acres. The study made the following assumptions:

- 2005 traffic counts were used to establish "background traffic";
- Traffic for the period 2005 through 2008 was projected to grow at 5%;
- No school traffic was projected to use the unpaved portion of Alder School Road – Route 711 from the Berlin Turnpike – Route 287.

Note that there are key differences in the assumptions used for these two studies. In particular, the traffic growth rate for the HS-3 study is 3% higher than that assumed for the elementary school study, and the HS-3 study assumed that NO school traffic would use the unpaved portion of Alder School Road.

b. Analysis

i. *Scope Not Completed.* As memorialized in the traffic scoping meeting agreement between Loudoun County Office of Transportation Services and the Timmons Group dated March 17, 2006, the following provisions were not completed:

- The study was to include "...other external roads to the extent that the projects generated traffic constitutes at least 15% of the roads current/existing traffic volumes." The 2001 Timmons TIA determined that at least 15% of the school traffic would travel on the unpaved portion of Alder School Road – Route 711 from the Berlin Turnpike – Route 287. This assumption appears to be substantiated by the actual traffic counts performed in 2005 (Item 1 – Study Area).
- The study was to add peak hour impact of the proposed use to the existing peak hour traffic (Item 4 – Traffic Volume Projections).
- The study was to include traffic analysis for the date of completion plus 10 years (Item 5 – LOS Analysis).

ii. *Flawed Analysis and Conclusions*

- The study includes as background traffic the trips to be generated from a future Special Exception request (Culbert Elementary School). This will serve to further dilute the traffic impact of the HS-3 proposal (Item 7 – Background Traffic Assumptions).
- The distribution of trips does not appear to be consistent with the location of school students as identified in Appendix 1.
- The study assumes major transportation improvements will be undertaken by the Town and/or County that are not funded or included

in CIP by either body. These include Main Street at 32<sup>nd</sup> Street, Main Street at Route 287, and Main Street at 20<sup>th</sup> Street.

- The study assumes a high rate of background traffic growth – 2 ½ times that previously estimated, when the area is now zoned for substantially less dense residential development.
- While internal trails have been added to the plan, the school site is not linked to any neighborhood by sidewalks, trails or greenways and no attempt has been made to coordinate pedestrian/bicycle trail access with the Town to the south to facilitate pedestrian access between the Town and this site, as recommended by the County Office of Transportation.
- Table 1A is used as a comparison to determine the number of buses required for HS-3. Heritage and Loudoun County high schools are not as similar to the HS-3 as Loudoun Valley High School. Using a school located in an area with similar demographics such as Loudoun Valley provides a more appropriate comparison. How was it determined that HS-3 would require only half the number of buses that LVHS uses?
- What percentage of students will arrive early, before peak hours? How will this overlap with the traffic at Mountain View Elementary? (Reference the comparison at County, Heritage and Loudoun Valley high schools, where a significant portion of AM & PM trips do not occur during peak hours.)
- How was the number of student drivers estimated? Did it take into account the more suburban, pedestrian-friendly environment that exists at other high schools that might be used for comparison? Virtually no students will be able to walk to the proposed Fields Farm high school.
- Please provide actual AM/PM peak hour traffic counts for Heritage High School, Loudoun County High School and Loudoun Valley High School.

c. Applicable Planning Policies

- i. Loudoun County General Plan. The Fiscal Planning and Public Facilities policies – Chapter 2 of the Revised General Plan direct the following regarding locations of school facilities:

*"4. Public School sites should be located at the focus of the attendance area and will provide safe and convenient access for students. All public schools will be linked to adjacent neighborhoods by sidewalks or trails on both sides of roadways and crosswalks, and where possible, linked to greenways or trails."*

- ii. Purcellville Urban Growth Area Management Plan (PUGAMP). The Transportation Networks Improvement policies of the PUGAMP – Chapter 6 directs the following:

- *"The following types of projects should be priorities for road improvements money: (a) paving unpaved roads in the UGA, and ...(c) improving secondary roads that function as major collectors (proposed northern Collector) or are important to improving the regional road network (Allder School Road) serving the UGA."*
- *"The Town and County will encourage the Virginia Department of Transportation to plan and construct an additional interchange on the Route 7 Bypass at Route 690. This interchange should be a priority for Primary Road Fund expenditures in western Loudoun County."*
- *"Ensure that roads within or serving the development operate at a level of service D or better."*

d. Traffic Study Conclusions

The TIA for the proposed LCPS development, located in the Purcellville Urban Growth Area, is flawed. The subsequent analysis and conclusions are not reliable because:

- The study underestimates the impact of traffic generated by the proposed use.
- The study dilutes the impact of the proposed use by including traffic from future Special Exception requests.
- The study inflates future background traffic as compared to previously adopted studies when the area has been zoned to develop less densely.
- The study assumes implementation of road improvements by others not contemplated or funded by them, which will negatively impact orderly road development.
- The study fails to complete all identified items as enumerated in the Traffic Scope Agreement with Loudoun County.
- The study proposes inadequate roads, pedestrian connections and other transportation services to support the proposed use which will negatively impact local transportation.
- The distribution of trips does not appear to correlate to the location of proposed students as identified in Appendix 1.

2. The SPEX application does not adequately address the transportation impacts on the road network within Purcellville and in the Purcellville area.

- a. The Town agrees with the County Office of Transportation Services (OTS) assessment that the additional high school traffic will "exacerbate the traffic

and thus congestion and delay” on the road network in and around Purcellville and that the Rt. 7/Rt. 690 interchange would help to divert some traffic from parallel facilities, including Main Street and Hirst Road. The Town also agrees with the OTS statement that some of the recommended improvements listed as created by background traffic are, in fact also partially created by the proposed high school, including improvements listed at the following locations that are entirely or partially located within the corporate limits:

- Business Rt. 7/Rt 287 intersection;
- Rt. 287 & Hirst Road;
- Main Street/ 21<sup>st</sup> Street/20<sup>th</sup> Street/Route 690 intersections;
- Main Street/23<sup>rd</sup> Street intersection;
- Main Street/Hatcher Avenue.

The Town does NOT agree with OTS that it is acceptable to delay completion of improvements to the Hirst Road intersections with Maple Avenue and Hatcher Avenue until one year after occupancy. Hirst Road is proposed to be used by traffic from both high schools, and traffic already backs up on Hirst Road during school hours, particularly at the Maple Avenue intersection. This causes further congestion on Rt. 287 and at the Rt. 287/Rt 7-interchange. All necessary improvements should be accomplished prior to the opening of the proposed high school. Please note that any improvements proposed within the corporate limits will require approval by the Town and VDOT.

- b. The Town is concerned about the ability of the Rt. 7/Rt. 287 Interchange and other intersections to handle the traffic caused by an additional high school. The interchange is already crowded. Some segments of the interchange and some of the approaches to the interchange do not currently function adequately. What will LCPS do to mitigate the impact of additional school traffic on this interchange?
- c. The LCPS response to OTS comments dated September 4, 2006 states, “there is a 331-mile network of unpaved rural roads that reflects the County’s agricultural heritage” and they have “a natural traffic calming effect”. The Countywide Transportation Plan states, “unpaved roads will be maintained in their current condition except for safety improvements.” The construction of the elementary school, surrounding residential development and the deterioration of Fields Farm’s historic structures noted above have reduced the rural character of the area. Therefore, the safety of the students should be the primary consideration in deciding whether to improve the unpaved portions of the roads serving this property. The applicant notes that they will restrict bus use of the gravel roads, but acknowledges that individual drivers to the high school will make their own decisions regarding their route to and from the school. Therefore, it is the applicant’s responsibility to ensure that all necessary safety improvements are made to area roads for the safety of young

drivers and their passengers, including paving of gravel roads, stream crossing improvements, and horizontal and vertical realignment as required.

- d. Land for the Northern Collector right-of-way should be reserved by the County as part of this application. The SPEX boundary was drawn just outside of the proposed alignment.
- e. Since attendance zone deliberations are just beginning, how will the final attendance zone for HS-3 be taken into account in the design and construction of transportation improvements to serve the school?
- f. Has a signalization warrant analysis been done to determine whether upgrades are required at any intersections to control the increased traffic? If so, please provide copies of the submissions to VDOT and VDOT's responses.
- g. The Town's transportation consultant Kimley-Horn has provided additional comments that are attached. They believe that a revised traffic report is necessary.

E. Statement of Justification

- 1. Whether the SPEX is consistent with the Comprehensive Plan: The Town disagrees with the assertion that the proposed HS-3 is consistent with PUGAMP, an element of both the Town and County comprehensive plans, as noted in paragraph 3 on page 5 of PUGAMP. See the Commission Permit and Communal Systems comments above for the reasons why the SPEX is not consistent with the Comprehensive Plan.
- 2. Open Space Assets (Group 3): The Statement of Justification defines Group Three/Open Space Assets as those that "afford active recreational opportunities for the community." However, in the LCPS response to the Town's comments dated 18 September, 2006 the County reiterates that the recreational facilities "are made available for scheduled use...through the athletic directors at the school or through the Department of Parks and Recreation activities...The new high school will be made available to the community in the same manner."

The Town believes that the Statement of Justification overstates the benefit to the community. The facilities will not be for community use in general, but only for those activities scheduled through County staff and only when not in use by the school system.

- 3. Heritage Resources Assets (Group 2): The PUGAMP Historic Resources Policy on page 18 states:

"2. The County and Town will encourage protection of rural historic structures in the UGA in the context of their natural settings. Areas



with particular views and/or historic amenities should be encouraged to be conserved as part of the new development.”

“3. The County and Town will encourage the adaptive re-use of historic structures in the UGA.”

The initial historic survey of this property in 2003 identified the collection of farmstead structures as being potentially eligible for listing on the National Register of Historic Places. However, only three years later, a new survey discovered the farmhouse and other significant historic structures had deteriorated to the point where the farmstead could no longer be recommended as being eligible for the National Register. The County appears to be ignoring the PUGAMP policies calling for preservation and adaptive re-use of historic structures by allowing these structures to deteriorate and proposing to demolish them. The major farmstead structures should be preserved and adaptively reused.

4. Whether the SPEX will adequately provide for safety from fire hazards: Is emergency access for fire and rescue vehicles adequate? Please provide comments from the Fire Marshall's office. The LCPS should complete an analysis sufficient to show whether or not the existing County Sheriff's office and the Purcellville Volunteer Fire and Rescue companies are adequately staffed and equipped to provide services to the HS-3 at Fields Farm.
5. Whether the SPEX will contribute to or promote the welfare or convenience of the public: The Statement of Justification states, “The proposed school will serve a large area of Western Loudoun; however, the majority of the student population is situated along the Route 7 corridor.” The Revised General Plan states, “Public school sites should be located at the focus of the attendance area”. What is the focus of the attendance area for HS-3? Based on information provided by the LCPS, the centroid of the proposed attendance area is near the Grubb property under contract by the Loudoun County School Board. The Town requests a feasibility study for the location of a high school at this alternative, more centrally located site vis-à-vis the attendance area.
6. Whether the proposed special exception will be served adequately by essential public facilities and services: Please see the previous comments regarding communal systems and public safety services.
7. Economic Development impact: The Town has several comments regarding the impact of the proposed Fields Farm high school on economic development:
  - a. Extracurricular activities at Loudoun County high schools receive significant support from local businesses. Two high schools located in or adjacent to Purcellville will increase demands on the town's small businesses to support those activities and may negatively impact them.

- b. Have studies been done to see if a high school would have a positive economic development impact if it were to be located in or adjacent to another western Loudoun town?
  - c. As noted by LCPS in its Statement of Justification, "Purcellville is home to a variety of public facilities that serve the western Loudoun region, including schools." Concentrating many public facilities to serve western Loudoun County has placed an undue burden on the taxpayers of Purcellville.
8. Whether the proposed SPEX considers the needs of agriculture, industry and businesses in future growth: The negative traffic impacts from a second high school using town roads may have an adverse impact on Purcellville's efforts to attract and retain business within the town. In addition, the Town of Purcellville considers the water resources available at Fields Farm to be a necessary resource for the future economic growth of the Town's commercial tax base and a means to ameliorate a heavy tax burden on residents to pay for necessary public services.

F. Environmental Resources

- 1. The impact on existing wetlands has been estimated to be less than 0.1 acre, yet an area of 0.1 acre is greater than 4,300 square feet, a significant amount of wetland area. Please provide Corps of Engineers documentation that confirms that permits are not required.
- 2. On the SPEX plat dated December 12, 2006, the service road for the stadium, the SWM/BMP #1, and the sanitary facility for the high school are partially located in the 50-foot floodplain conservation buffer. In addition, the water line from the water treatment facility to the HS goes through the floodplain buffer and the shot put area intrudes on the landscape buffer.

G. Summary

In summary, the Town of Purcellville continues to recommend denial of this Special Exception application. The approval of this application would violate PUGAMP and, thus the Town/County Annexation Agreement, which requires that all development conform to the PUGAMP. Major concerns include:

- 1. The proposed location of a high school on a site different than the site specified for a high school in the PUGAMP area without a Commission Permit or an amendment to PUGAMP by both the County and the Town; and
- 2. Proposed use of alternative and possibly communal utility systems to serve the proposed school in violation of PUGAMP, the Revised General Plan, and Loudoun County Codified Ordinances;
- 3. Inadequate traffic impact study;

4. Negative traffic impacts on the road network serving the Town of Purcellville that are not being adequately mitigated by the applicant;
5. Failure to preserve important historic resources in the PUGAMP area; and
6. Potential negative impact on the ULYFL sports complex, which received previous County approval to use a large drainfield area now proposed for use by the high school;

It is the Town's position that this request does not meet the jurisdictional requirements for approval of a Special Exception. The construction and operation of a high school on the subject property will have a deleterious impact on the health, safety and welfare of the public, particularly those persons living or working in the Town, which will not be mitigated by the request in its present form.

# Purcellville Urban Growth Area Management Plan Existing and Proposed School Locations

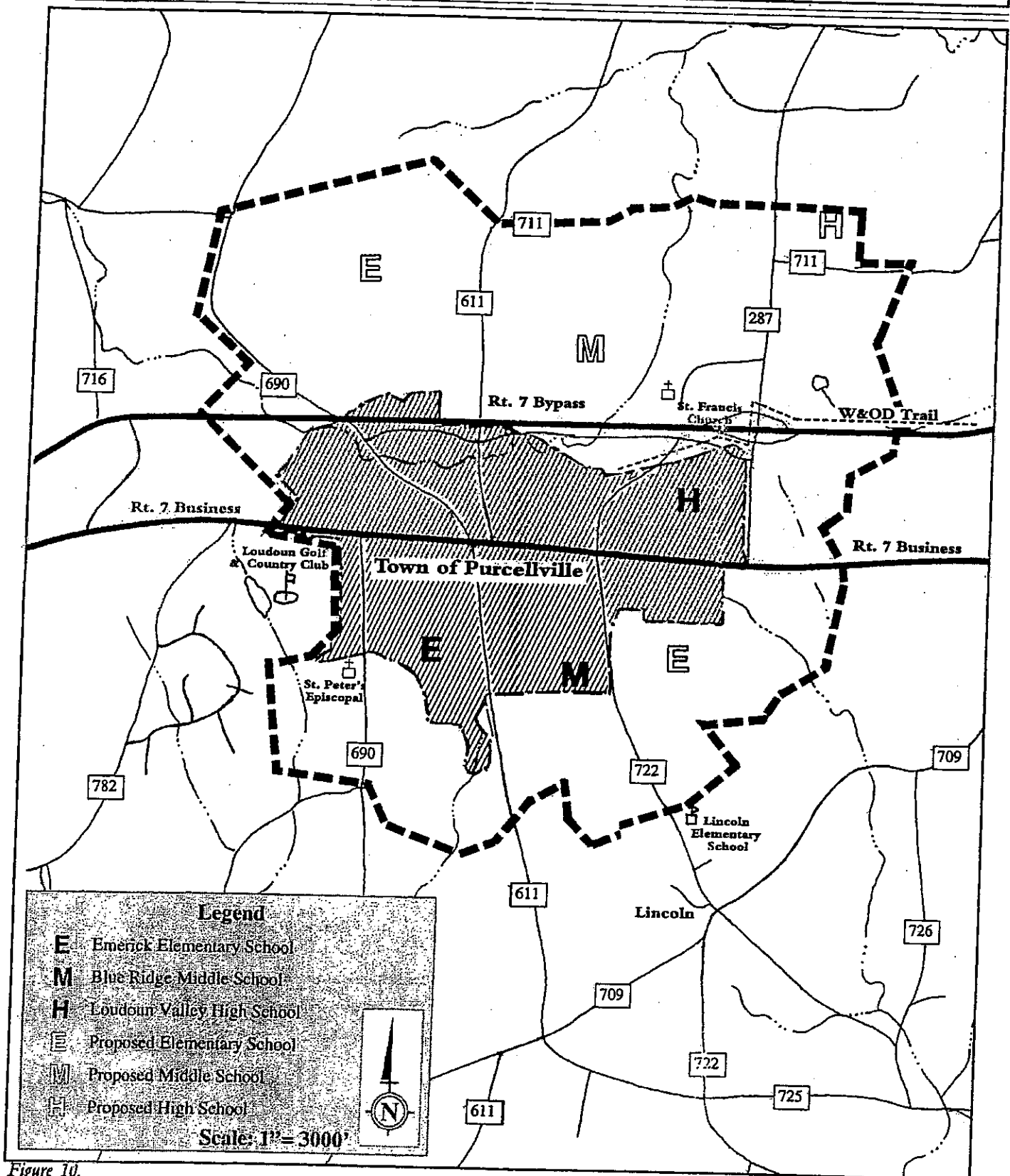


Figure 10.

# Purcellville Urban Growth Area Management Plan Existing and Proposed School Locations

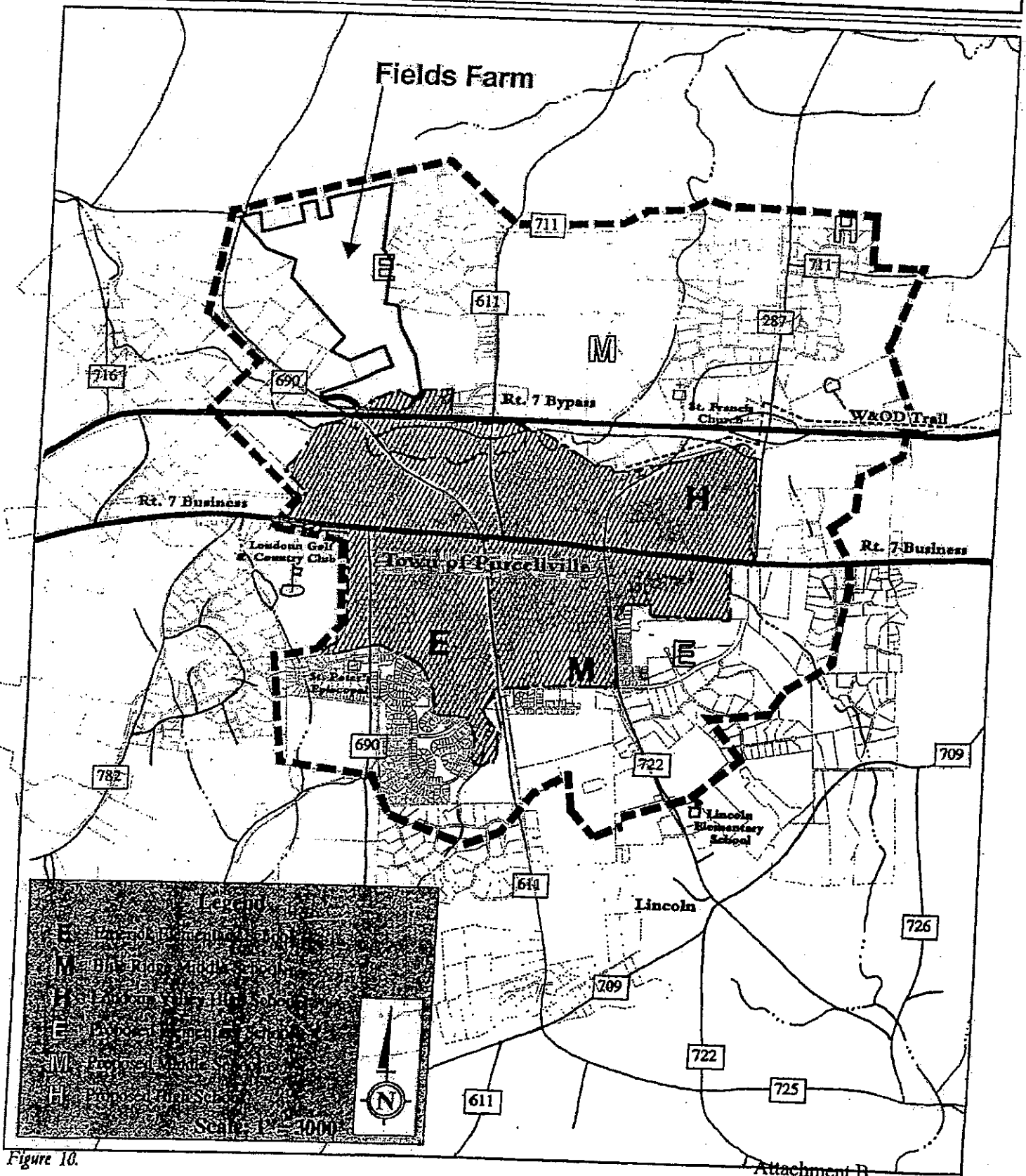


Figure 10.



**MEMORANDUM**

To: K. Wayne Lee, Jr., CZA  
Town of Purcellville – Assistant Town Planner

From: Geoff D. Giffin, P.E., PTOE  
Kimley-Horn and Associates, Inc.

Date: February 12, 2007

Subject: Western Loudoun County School (HS-3)  
Review of Traffic Impact Analysis Comment Responses

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This memorandum summarizes our review of the comment responses for the Western Loudoun County High School traffic impact analysis. Based on our review of the comment responses we recommend that a revised report or memorandum be prepared. While responding to individual comments is typically a good response approach, this project involves several inter-related items. As a result, a revised traffic report or memorandum would provide the needed clarification and information to address all the Town's comments. It should be noted that a detailed review of the traffic analysis results has not been performed since the revised analysis (as described in the comment response) was not provided and further clarification is necessary.

To provide further guidance for developing the revised traffic report, we have addressed each comment response below. A copy of the Town's comments and the corresponding comment responses provided by you are attached for reference.

**Traffic Impact Analysis Comments:**

**Item 7 – Proposed high school and existing elementary school information**

This matter was adequately addressed. This information should be incorporated into the revised traffic report.

**Item 8 – Consideration of Mountain View Elementary School in traffic analysis**

This matter was adequately addressed. This information should be noted in the revised traffic report.